

SCANNED

001 1-9 1999



068156-00005

from
33660-40

REGULATORY CASE



068156-00005

c.c. milano 354544
N. Posizione Meccanogr. MI/022539
iscr. Trib. di Milano al n. 56.465 Soc.
cod. fisc. 00778300152
part. IVA 00778300152
cap. soc. L. 8.496.000.000 ml. vers.



IMCI S.p.A.
industria prodotti chimici
Via Fratelli Beltrami, 11
20026 Novate Milanese - Italia

Novate Milanese, 10/02/04

FAO
Viale delle Terme di Caracalla
00100 Rome
Italy

WHO
CH- 1211 Geneva 27
Switzerland

and

Ministero de Agricultura Pesca y Alimentation
Subdireccion de Sanidad Vegetal
Calle Velasquez, 147
E-280082 MADRID
SPAIN

Pesticide Safety Directorate
Mallard House, Kings Pool, 3 Peasholme Green
YORK YO1 7PX
UK

Ministere de l'Agriculture de l'Alimentation, de la Pêche e des Affaires Rurales
Direction Generale de l' Alimentation
Sous Direction de la Qualité e de la Protection de Vegetaux
251 rue de Vaugirard
75732 PARIS CEDEX 15
France

Ministero della Sanità
Dip.to Alimenti e Nutrizione e Sanità Pubblica Veterinaria
Ufficio XIV
Piazzale Marconi, 25 -00144 ROMA
ITALY

The Danish Environmental Protection Agency
Strangade 29
DK-1401 Copenhagen
Denmark

2

c.c. milano 354544
N. Posizione Meccanogr. MI/022539
iscr. Trib. di Milano al n. 56.465 Soc.
cod. fisc. 00778300152
part. IVA 00778300152
cap. soc. L. 8.496.000.000 int. vers.



I.Pi.Ci. S.p.A.
industria prodotti chimici
Via Fratelli Beltrami, 11
20026 Novate Milanese - Italia

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
401 "M" St. S.W.
Washington D.C. 20460
USA

MINISTRY OF AGRICULTURE
GENERAL DIRECTION OF PLANT PRODUCTION PROTECTION
DEPARTMENT D'

Ippocratus 3-5
10679 Athens
GREECE

LETTER OF ACCESS TO CONFIDENTIAL DATA

Within the process of the development of FAO/WHO pesticide specifications, it is necessary to assess whether or not the confidential data on manufacturing process, purity and impurities, provided in support of the technical material for which an FAO/WHO specification is proposed, are similar to those assessed by a competent authority for the purposes of registering the pesticide.

The purpose of this letter of access, provided by I.Pi.Ci. S.p.A. Industria Prodotti Chimici Via F.lli Beltrami 11 20026 Novate Milanese (MI) Italy in support of the development of pesticide specification for Pendimethalin, is to provide authorization for:

- (i) WHO and FAO to send the data provided by I.Pi.Ci. S.p.A. for Pendimethalin to USA (reference is made to the I.Pi.Ci. proprietary data submitted in support to the registrations of Pendimethalin technical Reg. N. 68156-5 and IPIMETHALIN-L Reg. N. 68156-6 ; Registrant DINTEC).
- (ii) the registration authority to assess the similarity between the data sent by WHO or FAO and those submitted for registration purposes to that authority keeping in account that Pendimethalin now produced and sold by Finchimica I.Pi.Ci. Group warrants higher contents of Active Ingredient (min 97 % instead

c.c. milano 354544
N. Posizione Meccanogr. MI/022539
iscr. Trib. di Milano al n. 56.465 Soc.
cod. fisc. 00778300152
part. IVA 00778300152
cap. soc. L. 8.495.000.000 int. vers.



I.Pi.Ci. S.p.A.
industria prodotti chimici
Via Fratelli Beltrami, 11
20026 Novate Milanese - Italia

of the previous minimum 92.6%; according to the Five Batches Analysis the minimum is 98.3 %) ; and

(iii) subsequent communication of the registration authority's assessment to WHO and FAO .

This authorization relates only to the above mentioned substance manufactured by Finchimica S.p.A I.Pi.Ci. Group for the intended purpose as described above.

I. Pi. Ci. S.p.A.
MANAGING DIRECTOR
Ing. Luciano Spora

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 30 2003

Steve A. McMaster
Dintec Agrichemicals
9330 Zionsville Rd.
Indianapolis, IN 46268-1054

Dear Mr. McMaster:

Subject: Label Amendments
Pendimethalin Technical
EPA Reg. No. 68156-5
Submission dated February 24, 2003

The labeling, referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

1. It is recommended that you add a section on "Personal Protective Equipment" with the following statements:

Formulators and handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical resistant gloves made of waterproof materials, such as butyl rubber ≥ 14 mils, natural rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, or nitrile rubber ≥ 14 mils.
- Shoes plus socks.

2. Under "Warranty Limitations and Disclaimer";

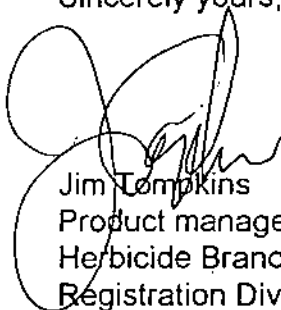
The Agency has not reviewed or accepted the warranty and liability statements. It may need to be changed at a later date.

5

Page 2
EPA Reg. No. 68156-5

The amended label supersedes all previously accepted labels. A stamped copy of the revised label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

Sincerely yours,



Jim Tompkins
Product manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure

6

CONCURRENCES							
SYMBOL ▶	7505C						
SURNAME ▶	Bien						
DATE ▶	6-26-03						

EPA form 1320-1 (12-70) OFFICIAL FILE COPY

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**

pendimethalin; N-(1-ethylpropyl)-3,4-
dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

ACCEPTED
with COMMENTS
in EPA Letter Dated

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

68156-5

JUN 30 2003

CAUTION

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin • Causes Moderate Eye Irritation

Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

First Aid

If swallowed: Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice..

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans** (Dry, Lima, Snap, Chickpeas [Garbanzo beans], **Peas** (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils), **Southern Peas** (Cowpeas)), **Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide**Net Weight __ lb**

8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

03/05/2003

STEVE A. MCMASTER
DINTEC AGRICHEMICALS
9330 ZIONSVILLE RD
INDIANAPOLIS IN 46268

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: PENDIMETHALIN TECHNICAL
COMPANY NAME: DINTEC AGRICHEMICALS
OPP IDENTIFICATION NUMBER: 293567
EPA REGISTRATION NUMBER: 68156-5
EPA RECEIPT DATE: 02/24/2003

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Jim Tompkins, Product Manager 25, at (703)-305-5697.

Sincerely,

J. White

Front End Processing Staff
Information Services Branch
Program Management and Support Division

9



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number
293567
280598

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/68156-5	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/PENDIMETHALIN TECHNICAL	PM# PM/25	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in Composition and labeling to: EPA Reg. No. Product Name	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Proposed Label Changes by Amendment:

1. Removed KOROC statement as allowed by EPA Label Review Manual (Chap 8-6)
2. Revised Precautionary Statements consistent with Cat III for dermal and eye irritation (EPA Label Review Manual (Chap 8, pp 9-10))
3. Removed Spanish, as this technical product is not within the scope of WPS
4. Updated first aid area to include S00 number in accordance with PR Notice 2001-1
5. Minor editing of First Aid text consistent with PR Notice 2001-1

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
Certification must be submitted	If "Yes" Unit Packaging wgt. container	If "Yes" Package wgt. container		<input type="checkbox"/> Plastic	
	No. per container	No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point /Complete items directly below for identification of individual to be contacted, if necessary, to process this application			
Name Steve A. McMaster		Title Regulatory Manager	
		Telephone No. (Include Area Code) (317) 337-4670	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowing false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			3. Date Application Received (Stamped) 10
2. Signature 		3. Title Regulatory Manager	
4. Typed Name Steve A. McMaster		5. Date 21 February 2003	
* Trademark of Dow AgroSciences LLC			

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended-reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

A

308/2E
February 21, 2003



Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Attention: James A. Tompkins / PM 25 (7505C)

PENDIMETHALIN TECHNICAL (A.I. PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF AMENDED MAIN LABELING - PR NOTICE 2001-1

Enclosed is proposed amended labeling for Pendimethalin Technical herbicide, EPA Reg. No. 68156-5, based on EPA stamped accepted labeling dated May 25, 2000.

Proposed Label Changes by Amendment:

1. Removed KOROC statement as allowed by EPA Label Review Manual (Chap 8-6)
2. Revised Precautionary Statements consistent with Cat III for dermal and eye irritation (EPA Label Review Manual (Chap 8, pp. 9-10)
3. Removed Spanish, as this technical product is not within the scope of WPS
4. Updated first aid area to include 800 number in accordance with PR Notice 2001-1
5. Minor editing of First Aid text consistent with PR Notice 2001-1

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1 (OPP No.: 280598)
- Label titled Pendimethalin Technical (D7A / Pendimethalin Technical / Amend With Edits / 02-20-03) (2 Pages plus Registration Notes) (1 Edited Copy)
- Label titled Pendimethalin Technical (D7A / Pendimethalin Technical / Amend / 02-20-03) (2 Pages plus Registration Notes) (5 Clean Copies)

Please contact Cindy Loy, Label/Registration Specialist (317/337-4655 / caloy@dow.com) if you need further information, or Paula McKinnies, Registration Assistant for this product (317/337-4679 / pmckinnies@dow.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Steve A. McMaster".

Steve A. McMaster
Regulatory Manager
Regulatory Success - Americas
PH: 317/337-4670
FX: 317/337-4649
samcmaster@dow.com

Enclosures
/pkm

Pendimethalin Technical

EPA Reg. No. 68156-5

Registration Notes:

Source label text based on EPA accepted copy dated May 25, 2000.

Proposed Changes by Amendment:

1. Removed KOROC statement as allowed by EPA Label Review Manual (Chap 8-6).
2. Revised Precautionary Statements consistent with Cat III for dermal and eye irritation (EPA Label Review Manual (Chap 8, PP 9-10).
3. Removed Spanish, as this technical product is not within the scope of WPS.
4. Updated first aid area to include 800 number in accordance with PR-Notice 2001-1.
5. Minor editing of First Aid text consistent with PR Notice 2001-1.

[Editor's note: Added text is underlined and deleted text is denoted by strike-through.]

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**pendimethalin: N-(1-ethylpropyl)-3,4-
dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

~~Keep Out of Reach of Children~~**CAUTION — PRECAUCION**~~Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.~~

Precautionary Statements

Hazards to Humans**Harmful If Swallowed Or Absorbed Through The Skin • Causes Moderate Eye Irritation****Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.****First Aid****If swallowed:** Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.**Note:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.**Environmental Hazards**

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. -Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

14

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans** (Dry, Lima, Snap, Chickpeas [Garbanzo beans], **Peas** (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils), **Southern Peas** [Cowpeas]), **Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide**Net Weight __ lb**

15



308/2E
June 12, 2000

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM 25 (7505C)

PENDIMETHALIN TECHNICAL (A.I. PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF FINAL PRINTED SUPPLEMENTAL LABELING

Enclosed is final printed labeling for Pendimethalin Technical herbicide based on EPA-accepted labeling dated May 25, 2000.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1 (OPP: 271218)
- Supplemental Label entitled: Pendimethalin Technical (D7A / Pendimethalin Technical / FPL / 06-08-00) (2 Pages plus registration notes) (3 Copies)

If you require further information, please contact Richard Bjerregaard, Label/Registration Specialist at (317) 337-464674 or Paula McKinnies, Registration Assistant for this product, at (317) 337-4679.

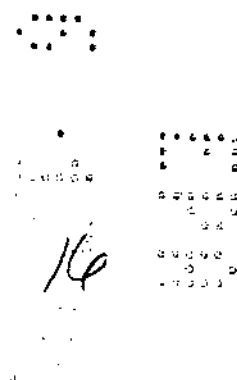
Sincerely,

A handwritten signature in black ink, appearing to read "Steve A. McMaster". The signature is written in a cursive, flowing style.

Steve A. McMaster
Regulatory Manager
Regulatory Success - Americas
(317) 337-4670
(317) 337-4649 (FAX)

/pkm

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

271218

Application for Pesticide - Section I

1. Company/Product Number Dintec/68156- 5	2. EPA Product Manager James A. Thompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dintec/ PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dintec Agrichemicals 9330 Zionsville Road Indianapolis, IN 46268-1054 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in Composition and labeling to: EPA Reg. No. Product Name	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>May 25, 2000</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other- Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Final printed labeling based on EPA Accepted copy dated May 25, 2000.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
	If "Yes" Unit Packaging wgt. container	No. per container	If "Yes" Package wgt.	No. per container	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

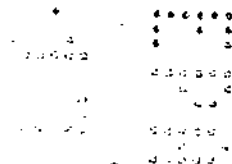
1. Contact Point /Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Steve A. McMaster	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4670
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowing false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped) 17
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Steve A. McMaster	5. Date June 12, 2000	

Pendimethalin Technical

EPA Reg. No. 68156-5

Registration Notes:

Final printed label based on EPA accepted copy dated May 25, 2000.



18

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only

Active Ingredient:

pendimethalin: N-(1-ethylpropyl)-3,4-
dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.

Avoid contact with skin, eyes or clothing.

First Aid

If **swallowed**: Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

If in **eyes**: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

If on **skin or clothing**: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment.

Note: Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

J. Scott 6-28-00

19

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Peas (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils), Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Weight lb/kg

20

MAY 25 2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

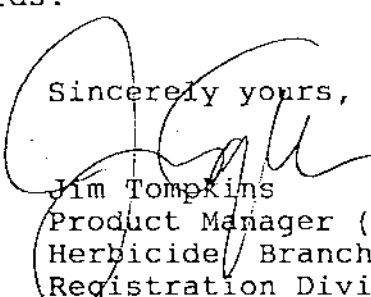
Mr. Steve A. McMaster
Regulatory Manager
Dow AgroSciences
9330 Zionsville Road
Indianapolis, IN 46268-1054

Dear Mr. McMaster:

Subject: Label Amendment- Approved Supplemental Labeling
Pendimethalin Technical
EPA Reg. No. 68156-5
Your submission dated May 16, 2000

The Labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable and a stamped copy is enclosed for your records.

Sincerely yours,


Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505c)

21



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number
264543
271232

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/68156-5	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/ Pendimethalin Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dintec Agrichemicals 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in Composition and labeling to: EPA Reg. No. Product Name	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Source label text based on EPA accepted copy dated December 16, 1999.

Proposed Changes by Amendment:

- Registered Uses for which this Product may be Formulated: Added Peas (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils).
- Precautionary Statements: Revised First Aid statements in accordance with PR Notice 2000-3.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point / Complete items directly below for identification of individual to be contacted, if necessary, to process this application		
Name Steve A. McMaster	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4670

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowing false or misleading statement may be punishable by fine or imprisonment both under applicable law.

8. Date Application Received
(Stamped)

2. Signature 	3. Title Regulatory Manager
4. Typed Name Steve A. McMaster	5. Date May 16, 2000

* Trademark of Dow AgroSciences LLC

PAPERWORK REDUCTION ACT NOTICE AND INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29); [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 85-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) (3) (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter data if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types.
Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

23



308/2E
May 16, 2000

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF AMENDED LABELING

Enclosed is proposed amended labeling for Dintec Pendimethalin Technical herbicide based on EPA stamped accepted labeling dated December 16, 1999. Dintec understands that American Cyanamid is in the process of amending their technical label to add peas. With this registration action underway, Dintec respectfully requests that the Agency consider this action concurrently with the action on AmCy's label.

Proposed Changes by Amendment:

1. Registered Uses for which this Product may be Formulated: Added Peas (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils).
2. Precautionary Statements: Revised First Aid statements in accordance with PR Notice 2000-3.

Contents of Submission

- Transmittal document (this letter)
 - Application for Pesticide, EPA Form No. 8570-1 (OPP No.: 271232)
 - Label entitled Pendimethalin Technical (D7A/Pendimethalin Technical/Amend With Edits/05-04-00) (2 Pages plus Registration Notes) (1 Edited Copy)
 - Label entitled Pendimethalin Technical (D7A/Pendimethalin Technical/Amend/05-04-00) (2 Pages plus Registration Notes) (4 Clean Copies)
- 24

James A. Tompkins/PM-25 (7505C)
PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF AMENDED LABELING
May 16, 2000
Page 2

If you require further information, please contact Richard Bjerregaard, Labeling/Registration Specialist at (317) 337-4674 or Paula McKinnies, Registration Assistant for this product, at (317) 337-4679.

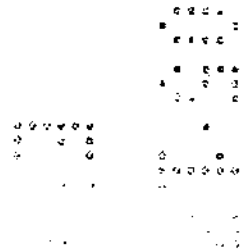
Sincerely,



Steve A. McMaster
Regulatory Manager
Regulatory Success - Americas
(317) 337-4670
(317) 337-4649 (FAX)

SAM/pkm/kms

Enclosures



25

Pendimethalin Technical

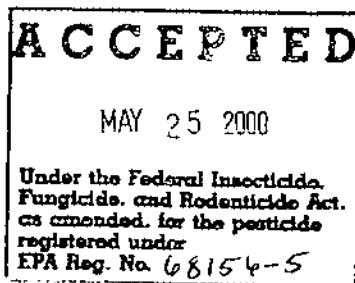
EPA Reg. No. 68156-5

Registration Notes:

Source label text based on EPA accepted copy dated December 16, 1999.

Proposed Changes by Amendment:

1. **Registered Uses for which this Product may be Formulated:** Added Peas (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils).
2. **Precautionary Statements:** Revised First Aid statements in accordance with PR Notice 2000-3.



26

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**

pendimethalin: N-(1-ethylpropyl)-3,4-

dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans**Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.****Avoid contact with skin, eyes or clothing.****First Aid**

If swallowed: Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment.

Note: Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

E O C U V O
C O N T
C O N T

27

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans** (Dry, Lima, Snap, Chickpeas [Garbanzo beans], **Peas** (English, Dry Garden, Dwarf, Green, Pigeon, Edible Pod, and Lentils), Southern Peas [Cowpeas]), **Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. 28

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Weight lb/kg



308/2E
January 10, 2000

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF FINAL PRINTED MAIN LABELING

Enclosed is final printed labeling for Pendimethalin Technical herbicide based on EPA-accepted labeling dated December 16, 1999, deleting the previously registered uses -- Landscape and Ground Maintenance Programs, Turfgrasses and Total Vegetative Control.

Note: We received your letter approving the amended labeling and Confidential Statement of Formula (CSF) for Dintec Registration Number 68156-5. However, the product name referred to in your letter is incorrect. The correct product name is Pendimethalin Technical, not Ipimethalin-L as you indicated.

Contents of Submission

- Transmittal document (this letter)
- Label entitled Pendimethalin Technical (D7A/ Pendimethalin Technical/FPL/01-04-00) (2 Pages) (2 Copies)

If you require further information, please contact me at (317) 337-4661, e-mail: lehammond@dowagro.com or Kim Sellar, Registration Assistant for this product, at (317) 337-4657.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry E. Hammond". The signature is fluid and cursive, with a large loop at the end.

Larry E. Hammond
Regulatory Manager
Regulatory Success - Americas
(317) 337-4649 (FAX)

LEH\kms

Enclosures

29

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**

pendimethalin: N-(1-ethylpropyl)-3,4-

dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

Except Changes NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

T. Scott 1-24-00

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.

Avoid contact with skin, eyes or clothing.

First Aid

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

If on skin: Wash with plenty of soap and water. Get medical attention.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes. *****

30

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Contents Wt. lb/kg

31

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only

Active Ingredient:

pendimethalin: N-(1-ethylpropyl)-3,4-
dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.

Avoid contact with skin, eyes or clothing.

First Aid

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

If on skin: Wash with plenty of soap and water. Get medical attention.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

32

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans** (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), **Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Contents Wt. ____ lb/kg

33

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Larry Hammond
Regulatory Manager
Regulatory Success - Americas
Dintec Agrochemicals
9330 Zionsville RD
Indianapolis, IN 46268-1054

DEC 16 1999

Dear Mr. Hammond:

SUBJECT: Ipimethalin-L,
EPA Registration Number 68156-5
Label Amendment Deleting Several Registered Uses Submitted
November 22, 1999
OPP Identifier Number 267265

The label amendment deleting the previously registered uses - Landscape and Ground Maintenance Programs, Turfgrasses and Total Vegetative Control - is acceptable.

Sincerely,



for James Tompkins
Product Manager 25
Herbicide Branch
Registration Division

CONCURRENCES

SYMBOL *	7505C							
SURNAME *	Lisa Jones							
DATE -->	Dec-16, 1999							

Pendimethalin Technical

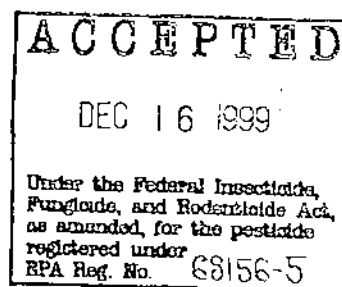
EPA Reg. No. 68156-5

Registration Notes:

Source label text based on EPA accepted copy dated May 27, 1999 with conditions of acceptance.

Proposed Changes by Amendment:

1. **Deletion of Registered Uses:** The following uses were deleted from the list of uses for which this product may be formulated: Landscape and Ground Maintenance Programs, Turfgrasses, and Total Vegetative Control.



35

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**

pendimethalin: N-(1-ethylpropyl)-3,4-

dimethyl-2,6-dinitrobenzenamine 92.6%

Inert Ingredients 7.4%

Total 100.0%

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.**Avoid contact with skin, eyes or clothing.**

First Aid

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.**If in eyes:** Flush eyes with plenty of water. Call a physician if irritation persists.**If on skin:** Wash with plenty of soap and water. Get medical attention.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

36

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site, or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Contents Wt. ____ lb/kg

37



308/2E
November 22, 1999

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF AMENDED LABELING

Enclosed is proposed amended labeling for Dintec Pendimethalin Technical herbicide based on EPA stamped accepted labeling dated May 27, 1999 with conditions of acceptance. Listed below are the proposed label changes:

1. Deletion of Registered Uses: The following uses were deleted from the list of uses for which this product may be formulated: Landscape and Ground Maintenance Programs, Turfgrasses, and Total Vegetative Control.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form No. 8570-1 (OPP No.: 265794)
- Label entitled Pendimethalin Technical (D7A/Pendimethalin Technical/Amend With Edits/09-15-99) (2 Pages plus Registration Notes) (1 Edited Copy)
- Label entitled Pendimethalin Technical (D7A/Pendimethalin Technical/Amend/09-15-99) (2 Pages plus Registration Notes) (4 Clean Copies)

38

James A. Tompkins/PM-25 (7505C)
PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF AMENDED LABELING
November 22, 1999
Page 2

If you require further information, please contact me at (317) 337-4661, e-mail: lehammond@dowagro.com or Kim Seller, Registration Assistant for this product, at (317) 337-4657, e-mail: kmseller@dowagro.com.

Sincerely,

Larry E. Hammond/RLC

Larry E. Hammond
Regulatory Manager
Regulatory Success - Americas
(317) 337-4649 (FAX)

LEH\kms

Enclosures

39



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 26 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Richard S. Bjerregaard, PH.D.
Labeling Manager
U.S. Regulatory, Toxicology and Environmental Chemistry
DowElanco
9330 Zionsville Road
Indianapolis, IN 46268-1054

Dear Dr. Bjerregaard:

Subject: Placement of KORAC Statement, Signal Word and
Precautionary Statements on Front Panel of Label

In your letter dated February 20, 1997, you requested guidance from the Labeling Unit regarding usage and placement of the EPA required signal word in cases when the KORAC Statement and the entire Precautionary Statements Section both appear on the front panel of the label.

It is the view of the Labeling Unit that in the circumstances specified above, it is not necessary to list the EPA signal word twice on the front panel. This view also seems to reflect past practices by most Product Managers. Regarding the placement of the KORAC Statement, Signal Word and Precautionary Statements listed on the front panel, the preferred location is for the KORAC Statement to appear first immediately followed by the EPA Signal Word immediately followed by the Precautionary Statements Section.

Please note that implementation of the above guidance is done so as the discretion of the appropriate Product Manager who may also consider product or chemical specific issues when deciding the correct use and placement of EPA required label text.

Sincerely yours,

Jim Downing

Jim Downing, Team Leader
Labeling Unit

CC: RD, AD and BPPD Product Managers

40



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber



United States
Environmental Protection Agency
Washington DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

~~265794~~
267265

Application for Pesticide - Section I

1. Company/Product Number 68156-5	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pendimethalin Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dintec Agrichemicals 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling EPA Reg. No. [REDACTED] Product Name [REDACTED]

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> Other - Explain below.
<input type="checkbox"/> Notification - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED

Deletion of the following registered uses for which this product may be formulated: Landscape and Ground Maintenance Programs, Turfgrasses, and Total Vegetation Control.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Larry E. Hammond	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4661
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) 4/
2. Signature Larry E. Hammond/RLC	3. Title Regulatory Manager	
4. Typed Name Larry E. Hammond	5. Date 11-22-99	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Larry Hammond
Regulatory Manager
Regulatory Success - Americas
Dintec Agrochemicals
9330 Zionsville RD
Indianapolis, IN 46268-1054

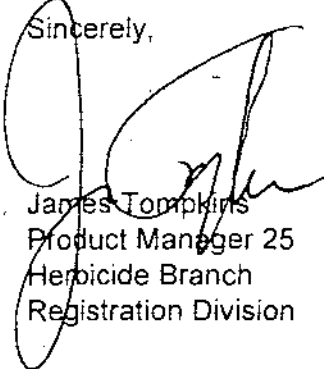
Dear Mr. Hammond:

SUBJECT: Ipimethalin-L,
EPA Registration Number 68156-5
Revised Basic Formulation CSF and Formulator's Exemption submitted
November 22, 1999
OPP Identifier Number 267266

The revised basic formulation CSF dated 9/15/99 is acceptable and so is the formulator's exemption dated 11/22/99.

If you have any questions, please contact Lisa Jones of my staff by phone at (703) 308-9424, or by e-mail at jones.lisa@epa.gov.

Sincerely,



James Tompkins
Product Manager 25
Herbicide Branch
Registration Division

CONCURRENCES

SYMBOL *	7505C							
SURNAME *	Lisa Jones							
DATE *	Dec 9, 1999							

42



United States
Environmental Protection Agency
Washington DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

265796
267266

Application for Pesticide - Section I

1. Company/Product Number 68156-5	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pendimethalin Technical	PM# 25.	
5. Name and Address of Applicant (Include ZIP Code) Dintec Agrichemicals 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. [REDACTED] Product Name [REDACTED]	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED

Amended Confidential Statement of Formula (CSF) dated 9/15/99 to replace 7/20/99 CSF. Formulator's exemption statement is also enclosed due to source of active ingredient listed in amended CSF.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
5. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Larry E. Hammond		Title Regulatory Manager		Telephone No. (include Area Code) (317) 337-4561	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) 43
2. Signature Larry E. Hammond PLC		3. Title Regulatory Manager			
4. Typed Name Larry E. Hammond		5. Date 11-22-99			



308/2E
November 22, 1999

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL (A.I.: PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
AMENDMENT OF SECTION 3 REGISTRATION - CONFIDENTIAL STATEMENT OF
FORMULA (CSF)

Enclosed is an amended Confidential Statement of Formula (CSF) for Dintec Pendimethalin Technical. This proposed CSF is to replace the EPA-accepted CSF dated July 20, 1999. The amended CSF is [REDACTED]

[REDACTED] Since the previous Dintec Pendimethalin Technical CSF listed the active ingredients plus impurities, and because the revised CSF is a 100% repack, Dintec is enclosing a completed formulator exemption form.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form No. 8570-1 (OPP No.: 265796)
- Confidential Statement of Formula for Pendimethalin Technical (19A/Basic/68156-5/09-15-99) (1 Page) (2 Originals)
- Formulator's Exemption Statement, EPA Form 8570-27

PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED

44

James A. Tompkins/PM-25 (7505C)
PENDIMETHALIN TECHNICAL (A.I.: PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
AMENDMENT OF SECTION 3 REGISTRATION - CONFIDENTIAL STATEMENT OF FORMULA (CSF)
November 22, 1999
Page 2

If you require further information, please contact me at (317) 337-4661, e-mail:
lehammond@dowagro.com or Kim Seller, Registration Assistant for this product, at
(317) 337-4657, e-mail: kmseller@dowagro.com.

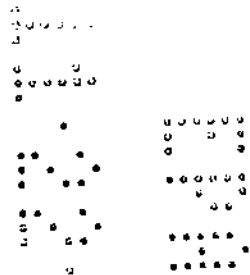
Sincerely,

Larry E. Hammond/RLC

Larry E. Hammond
Regulatory Manager
Regulatory Success - Americas
(317) 337-4649 (FAX)

LEH/kms

Enclosures



45

EPA Reg. NO. 68156-00005

Page is not included in this copy.

Pages 46 through 49 are not included in this copy.

The material not included contains the following type of information:

- Identity of product inert ingredients.
- Identity of product impurities.
- Description of the product manufacturing process.
- Description of quality control procedures.
- Identity of the source of product ingredients.
- ☒ Sales or other commercial/financial information.
- A draft product label.
- The product confidential statement of formula.
- Information about a pending registration action.
- FIFRA registration data.
- The document is a duplicate of page(s) .
- The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

265768

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/68156-5	2. EPA Product Manager James A. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/ Pendimethalin Technical	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in Composition and labeling to: EPA Reg. No. NOTIFICATION Product Name AUG 11 1999	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other- Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

On May 27, 1999 Dintec Agrichemicals received a new registration from EPA for a pendimethalin technical active ingredient, EPA Registration number 68156-5. The attached CSF updates the EPA-accepted CSF dated March 15, 1998.

Basic CSF dated 7/20/99

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point /Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name Larry E. Hammond	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4661
--------------------------	-----------------------------	-----------------------------------------------------

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowing false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <i>Larry Hammond</i>	3. Title Regulatory Manager	8. Date Application Received (Stamped) 50
4. Typed Name Larry E. Hammond	5. Date July 26, 1999	
6. Trademark of Dow AgroSciences LLC		



308/2E
July 26, 1999

9330 Zionsville Road
Indianapolis, IN 46268-1054
317-337-7870
317-337-7878 FAX

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
NOTIFICATION OF AMENDED CSF PER PR NOTICE 98-10

Enclosed is a Confidential Statement of Formula (CSF) for Pendimethalin Technical herbicide. On May 27, 1999 Dintec Agrichemicals received a new registration from EPA for a pendimethalin technical active ingredient, EPA Registration number 68156-5. The attached CSF updates the EPA-accepted CSF dated March 15, 1998.

This Notification includes these minor changes to bring the accepted CSF up to date:

Block 1: The name of the Registrant is changed to Dintec Agrichemicals. Approximately mid way through the EPA review, November 16, 1998 communication to EPA, the registrant name was changed. The EPA acceptance letter clearly states Dintec Agrichemicals as the registrant and not Industria Prodotti Chimici, S.p.A

Block 2: Added a U.S. manufacturing site.

Block 4: The new registration number is added, 68156-5.

Block 6: Added USA site.

Block 10, line 1: Added the chemical name of pendimethalin and CAS number.

Block 11, first line: [REDACTED] is added as a source of pendimethalin active ingredient.

PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED

51

James A. Tompkins/PM-25 (7505C)
PENDIMETHALIN TECHNICAL (PENDIMETHALIN)
EPA REGISTRATION NUMBER: 68156-5
NOTIFICATION OF AMENDED CSF PER PR NOTICE 98-10
July 26, 1999
Page 2

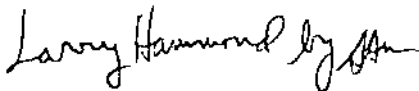
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1 (OPP No. 265768)
- Confidential Statement of Formula entitled Pendimethalin Technical (19A/Basic/68156-5/07-20-99)
(2 Pages) (2 Originals)

If you require further information, please contact me at (317) 337-4661, lehammond@dowagro.com or Kim Seller, Registration Assistant for this product, at (317) 337-4657.

Sincerely,



Larry E. Hammond
Regulatory Manager
Regulatory Success - Americas
(317) 337-4649 (FAX)

LEH\kms

Enclosures

• • • • •
• • • • •

• • • • •
• • • • •
• • • • •
• • • • •
• • • • •
• • • • •
• • • • •
• • • • •
• • • • •
• • • • •

52



308/2E
August 25, 1999

9330 Zionsville Road
Indianapolis, IN 46268-1034
317-337-7870
317-337-7878 FAX

Document Processing Desk (**FIN-LABEL**)
Office of Pesticide Programs (7504C)b
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: James A. Tompkins/PM-25 (7505C)

PENDIMETHALIN TECHNICAL
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF FINAL PRINTED MAIN LABELING

Enclosed is final printed labeling for Pendimethalin Technical herbicide based on EPA-accepted labeling dated May 27, 1999, with the following conditions of acceptance:

1. **Manufacturing Use Statement** revised to read "An Herbicide For Formulating Use Only."
2. **Statements of Hazard** revised to read: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing.
3. **First Aid Statement** - rather than reformat "If swallowed" to all capital letters, used bold text. Replaced the statement "In case of contact ... Call a physician" with the following statements:
If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.
If on skin: Wash with plenty of soap and water. Get medical attention.
4. **Warranty Statement** modified to show current Dintec Warranty Statement.
5. **"Manufacturing Chemical statement"** added per Dow AgroSciences label format requirements.
6. **"In case of emergency"** statement added per Dow AgroSciences label format requirements.

James A. Tompkins/PM-25 (7505C)
PENDIMETHALIN TECHNICAL
EPA REGISTRATION NUMBER: 68156-5
SUBMISSION OF FINAL PRINTED MAIN LABELING
August 25, 1999
Page 2

Contents of Submission

- Transmittal document (this letter)
- Label entitled Pendimethalin Technical (D7A/ Pendimethalin Technical /FPL/07-28-99) (2 Pages plus Registration Notes) (2 Copies)

If you require further information, please contact me at (317) 337-4661, e-mail: lehammond@dowagro.com or Kim Seller, Registration Assistant for this product, at (317) 337-4657.

Sincerely,



Larry E. Hammond
Regulatory Manager
Regulatory Success - Americas
(317) 337-4649 (FAX)

LEH/kms

Enclosures

54

Pendimethalin Technical

EPA Reg. No. 68156-5

Registration Notes:

Final Printed Label based on EPA accepted copy dated May 27, 1999 with the following conditions of acceptance:

1. **Manufacturing Use Statement** revised to read "An Herbicide For Formulating Use Only".
2. **Statements of Hazard** revised to read: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing.
3. **First Aid Statement** - rather than reformat "If swallowed" to all capital letters, used bold text. Replaced the statement "In case of contact ... Call a physician" with the following statements:
 If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.
 If on skin: Wash with plenty of soap and water. Get medical attention.

Other:

4. **Warranty Statement** modified to show current Dintec Warranty Statement.
5. **"Manufacturing Chemical statement"** added per Dow AgroSciences label format requirements.
6. **"In case of emergency"** statement added per Dow AgroSciences label format requirements.

55

(logo) Dintec Agrichemicals

Pendimethalin Technical

An Herbicide For Formulating Use Only**Active Ingredient:**

pendimethalin: N-(1-ethylpropyl)-3,4-	
dimethyl-2,6-dinitrobenzenamine	92.6%
Inert Ingredients	7.4%
Total	100.0%

Except Change NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

L. Scott Aug. 30, 1999

Keep Out of Reach of Children

CAUTION PRECAUCION

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

Precautionary Statements

Hazards to Humans

Harmful If Swallowed Or Absorbed Through The Skin. Causes moderate eye irritation.

Avoid contact with skin, eyes or clothing.

First Aid

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

If on skin: Wash with plenty of soap and water. Get medical attention.

Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Attention:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

56

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for formulation of herbicides to control most annual grasses and certain broadleaf weed on the following crops: **Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Landscape and Ground Maintenance Programs, Nonbearing Fruit, Nut Crops and Vineyards, Noncropland Areas (Including Tree Plantations), Ornamentals, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, Tobacco, Turfgrasses and Total Vegetative Control.**

Storage and Disposal

Storage: Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities. Open dumping is prohibited.

Warranty Limitations and Disclaimer

Dintec Agrichemicals warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dintec Agrichemicals EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 68156-5

EPA Est. _____

Dintec Agrichemicals • Indianapolis, IN 46268 U.S.A.

Herbicide

Net Contents Wt. ____ lb/kg.

57



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:
68156-5

Date of Issuance:
27 May 1999

NOTICE OF PESTICIDE:
 X Registration
 Reregistration

Term of Issuance: Conditional

Name of Pesticide Product:
Pendimethalin Technical

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Dr. Richard F. Bing, Director
Global Research and Development
Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, IN 46268-1054

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

2. Make the following changes to the attached label which is stamped "Accepted with Comments":

- Change the statement immediately following "Pendimethalin Technical" at the beginning of the label from "AN HERBICIDE FOR FORMULATING USE" to "AN HERBICIDE FOR FORMULATING USE ONLY."
- Under "Precautionary Statements -- Hazards to Humans" replace the text after the signal word CAUTION with: "Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing."
- Under "Statement of Practical Treatment" reformat "If swallowed" to all capital letters.
- Under "Statement of Practical Treatment" Replace the statement "In case of contact ... Call a physician" with the following statements:-
IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.
IF ON SKIN: Wash with plenty of soap and water. Get medical attention

3. Submit two copies of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Signature of Approving Official:

Date:

EPA Form 9570-6

Pendimethalin Technical

AN HERBICIDE FOR FORMULATING USE

ACTIVE INGREDIENT

Pendimethalin, (N-1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine 92.6%

INERT INGREDIENTS

7.4%

TOTAL:

100%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

Precaution!

Precaution Al Usuario: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

CAUTION. Harmful if swallowed. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.

In Case of Contact: Immediately flush eyes with plenty of water. Flush skin with water. Call a physician.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 27 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No. 68156-5

59
04/09/98

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for the formulation of herbicides to control most annual grasses and certain broadleaf weeds on the following crops:

Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible Beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Open dumping is prohibited.

LIMITATIONS OF LIABILITY AND DAMAGES

The liability of I.Pi.Ci. and any other seller for any loss or injury, whether based on negligence, breach of warranty, strict liability in tort, or any other cause of action, shall be limited to the purchase price of the product. Prompt notice of any claim must be given by the buyer to I.Pi.Ci. within ninety days after the application of the product or ninety days after the first planting, whichever is later. Notification to I.Pi.Ci. should be at this address: Industria Prodotti Chimici, S.p.A. (I.Pi.Ci.) Via F. Beltrami, 11, 20026 Novate Milanese, Italy.

I.Pi.Ci. and any other seller of the product shall not be liable, and any and all claims against I.Pi.Ci. and any other seller are waived, for special, indirect, incidental, or consequential damages or expenses of any nature, including, but not limited to, loss of profits or income, and crop or property loss or damage, whether or not based on negligence, breach of warranty, strict liability in tort or any other cause of action.

I.Pi.Ci. OFFERS THIS PRODUCT AND THE BUYER AND USER ACCEPT IT SUBJECT TO THE FOREGOING CONDITIONS OF SALE AND LIMITATIONS OR WARRANTY, LIABILITY AND DAMAGES, WHICH MAY BE VARIED ONLY BY AGREEMENT IN WRITING SIGNED BY A DULY AUTHORIZED REPRESENTATIVE OF I.Pi.Ci.

Net Weight:

EPA EST. No. 53591-IT-001

EPA Reg. No. 33660-

MANUFACTURED FOR

I.Pi.Ci. Industria Prodotti Chimici S.p.A.
Via Fratelli Beltrami, 11
20026 Novate Milanese
Italy

Updated Matrix

Product Name: Pendimethalin Technical
EPA File Symbol No. 68156-L
Date: April 7, 1999

Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Page 1 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

61-1	Product Identity		4/9/98	IPICI	Permission	4/9/98		44542101
61-2a	Beginning Materials & Manufacturing Process		4/9/98	IPICI	Permission	4/9/98		44542101
61-2b	Formation of Impurities		4/9/98	IPICI	Permission	4/9/98		44542101
61-3	Discussion of Formation of Ingredients		4/9/98	IPICI	Permission	4/9/98		44542101
62-1	Preliminary Analysis		4/9/98	IPICI	Permission	4/9/98		44557005; 44557006; 44557007; 44557001; 44557002; 44557003; 44557004
62-2	Certification of limits		4/9/98	IPICI	Permission	4/9/98		44557001
62-3	Analytical method		4/9/98	IPICI	Permission	4/9/98		44557005; 44557006; 44557007; 44557001; 44557002; 44557003; 44557004
63-2	Color		4/9/98	IPICI	Permission	4/9/98		44542102
63-3	Physical State		4/9/98	IPICI	Permission	4/9/98		44542102
63-4	Odor		4/9/98	IPICI	Permission	4/9/98		44542102
63-5	Melting Point		4/9/98	IPICI	Permission	4/9/98		44542103
63-6	Boiling Point						Not required - product is a solid	
63-7	Density		4/9/98	IPICI	Permission	4/9/98		44542104
63-8	Solubility		4/9/98	IPICI	Permission	4/9/98		44542105; 44542106
63-9	Vapor Pressure		4/9/98	IPICI	Permission	4/9/98		44542107

Updated Matrix Product Name: <u>Pendimethalin Technical</u> EPA File Symbol No. <u>68156-L</u> Date: <u>April 7, 1999</u>			Submitter: Dintec Agrichemicals 9330 Zionsville Road Indianapolis, Indiana 46268-1054			Page 2 of 16 Application for Registration Dated: <u>April 9, 1998</u>		
Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.

63-11	Octanol/Water Partition		4/9/98	IPICI	Permission	4/9/98		44542108
63-12	pH						Not required - product is a solid	
63-13	Stability		4/9/98	IPICI	Permission	4/9/98		44557008
63-14	Oxidizing/Reducing Action		4/9/98	IPICI	Permission	4/9/98		44542109
63-15	Flammability						Not required - product is a solid that does not contain combustible liquids	
63-16	Explosibility						Not required - product is not potentially explosive	
63-17	Storage stability		4/9/98	IPICI	Permission			44557009
63-18	Viscosity					4/9/98	Not required - product is a solid	
63-19	Miscibility					4/9/98	Not required - product is not intended to be diluted with petroleum solvents	
63-20	Corrosion characteristics		4/9/98	IPICI	Permission			44557009
63-21	Dielectric breakdown					4/9/98	Not required - product is a technical chemical	
Ecological Effects								
71-1a	Acute Avian Oral - quail/duck	00059739	1976	American Cyanamid	NR - Old	4/9/98		00059739

Updated MatrixProduct Name: Pendimethalin TechnicalEPA File Symbol No.: 68156-LDate: April 7, 1999Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Page 3 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

71-2a	Avian Dietary - duck	00026675	5/4/73	American Cyanamid	NR - Old	4/9/98		00026675
71-2b	Avian Dietary - mallard	00026674	5/4/73	American Cyanamid	NR - Old	4/9/98		00026674
71-4a	Avian Reproduction - quail				OJDD-4/9/98	4/9/98		
71-4b	Avian Reproduction - duck				OJDD-4/9/98	4/9/98		
72-1a	Fish Tox Bluegill	00106764	1973	American Cyanamid	NR - Old	4/9/98		00106764
72-1b	Fish Tox Bluegill - TEP	00037927	11/14/75 10/28/83	American Cyanamid	NR - Old OTP-4/9/98	4/9/98 4/9/98		00037927 00131773
72-1c	Fish Tox Rainbow Trout	00106764	1973	American Cyanamid	NR - Old	4/9/98		00106764
72-1d	Fish Tox Rainbow Trout - TEP	00037927	10/28/83 11/14/75	American Cyanamid	OTP-4/9/98	4/9/98 4/9/98		00131773 (Acc. 00251601) 00037927
72-1	Acute Tox Catfish	00251601	10/28/83	American Cyanamid	NR - Old	4/6/99		00251601
72-2a	Invertebrate Tox	FAOPEN 05	1976 1/22/81 1976	American Cyanamid	NR - Old	4/9/98 4/9/98 4/9/98		FAOPEN05 00071123 00059738
72-2b	Invertebrate Tox - TEP	00260404 00099889	11/6/85 1974	American Cyanamid Thompson Hayward	OTP-4/9/98 NR - Old	4/9/98 & 4/6/99 4/6/99		00153772 -MRID for Acc. 00260404 00099889
72-3a	Estuarine/Marine Tox Fish	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131774 -MRID for Acc. 00251601
72-3b	Estuarine/Marine Tox Mollusk	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131772 -MRID for Acc. 00251601

63

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 4 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

72-3c	Estuarine/Marine Tox Shrimp	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131775 -MRID for Acc. 00251601
72-3d	Estuarine/Marine Tox Fish - TEP	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131774 -MRID for Acc. 00251601
72-3e	Estuarine/Marine Tox Mollusk - TEP	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131772 -MRID for Acc. 00251601
72-3f	Estuarine/Marine Tox Shrimp- TEP	00251601	10/28/83	American Cyanamid	OTP-4/9/98	4/9/98 & 4/6/99		00131775 -MRID for Acc. 00251601
72-4b	Life Cycle Invertebrate	00247299	4/20/82	American Cyanamid	NR - Old	4/9/98		00100504 (Acc. 00247299)
72-5	Life Cycle Fish	00096342	9/8/77	American Cyanamid	NR - Old	4/9/98		00037940 (Acc. 00096342)
123-1a	Seed Germination/ Seedling Emergence	42372201 42372202	6/25/92 6/25/92	American Cyanamid	OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98		42372201 42372202
123-1b	Vegetative Vigor	42372203	6/25/92	American Cyanamid	OTP-4/9/98	4/9/98		42372203
123-2	Aquatic Plant Growth	42137101 42372204 42372205 42372206 42372207	12/20/91 6/25/92 6/25/92 6/25/92 6/25/92	American Cyanamid	OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		42137101 42372204 42372205 42372206 42372207
141-1	Honey Bee Acute Contact	00099890	7/31/78	American Cyanamid	NR - Old	4/9/98		00099890
142-3	Acute Tox Crayfish	00099889	unknown	Thompson-Hayward	NR - Old	4/6/99		00099889
Toxicology								

64

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 5 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
81-1	Acute Oral Tox	00026657	1972 11/20/75 4/11/90	American Cyanamid	NR - Old NR - Old OTP-4/9/98	4/9/98 4/9/98 4/9/98 - Ipimethalin L		00026657 00072802 41451904
81-2	Acute Dermal Tox	00026657	1972 11/20/75 4/11/90	American Cyanamid	NR - Old NR - Old OTP-4/9/98	4/9/98 4/9/98 4/9/98 - Ipimethalin L		00026657 00072802 41451905
81-3	Acute Inhalation	00073342	12/21/73 4/11/90	American Cyanamid	NR - Old OTP-4/9/98	4/9/98 4/9/98 - Ipimethalin L		00073342 41451906
81-4	Primary Eye Irritation	00026657	1972 11/20/75 4/11/90	American Cyanamid	NR - Old NR - Old OTP-4/9/98	4/9/98 4/9/98 4/9/98 - Ipimethalin L		00026657 00072802 41451907
81-5	Primary Dermal Irritation	00026657	8/24/73 11/28/73 4/11/90	American Cyanamid	NR - Old NR - Old OTP-4/9/98	4/9/98 4/9/98 4/9/98 - Ipimethalin L		00026663 00026657 41451908
81-6	Dermal Sensitization	00153767	11/6/85 4/11/90	American Cyanamid	OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 - Ipimethalin L		00153767 41451909
82-1a	90-Day Feeding Rodent	00059468 00059469 00106754 00156081 42054601 43135001 43135003	12/21/73 12/21/73 1972 1/30/86 10/16/91 2/23/94 2/23/94	American Cyanamid	NR - Old NR - Old NR - Old OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		00059468 00059469 00106754 00156081 42054601 43135001 43135003

65

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 6 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
82-1b	90-Day Feeding Non-rodent	00106754	2/26/81 9/9/96	American Cyanamid	NR - Old OTP-4/9/98	4/9/98 4/9/98	Cited under 82-1a	00058657 44106801
82-2	21-Day Dermal Rabbit/Rat	00026663	8/24/73	American Cyanamid	NR - Old	4/9/98		00026663
83-1a	Chronic Feeding Tox Rodent	40174401 42027802	4/24/87 9/19/91	American Cyanamid	OTP-4/9/98 OTP-10/8/98	4/9/98 11/11/98		40174401 42027802
83-1b	Chronic Feeding Tox Non-rodent	00058657 44106801	2/26/81 9/9/96	American Cyanamid	NR - Old OTP-4/9/98	4/9/98 4/9/98		00058657 44106801
83-2a	Oncogenicity Rat	40909901	4/24/87 6/12/91	American Cyanamid	OTP-4/9/98 OTP-4/9/98 & 10/8/98	4/9/98 4/9/98 & 11/11/98	Cited under 83-2b	40174401 41909701
83-2b	Oncogenicity Mouse		11/25/88 6/12/91	American Cyanamid	OTP-4/9/98 OTP-4/9/98 & 10/8/98	4/9/98 4/9/98 & 11/11/98		40909901 41909701
83-3a	Developmental Tox Rat	00025752	1/14/80 10/28/82 12/7/90 10/25/96	American Cyanamid	NR - Old NR - Old OTP-4/9/98 OTP-8/14/98	4/9/98 4/9/98 4/9/98 8/14/98 & 11/11/98		00025752 00117444 41725202 44144001
83-3b	Developmental Tox Rabbit	00117444 44106803 44106804	10/28/82 9/9/96 9/9/96	American Cyanamid	NR - Old OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 4/9/98		00117444 44106803 44106804

46

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 7 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
83-4	2-Generation, Reproduction	41725203 00026671 00040304 00059470	12/7/90 unknown (pre-1982) unknown (pre-1982) unknown (pre-1982)	American Cyanamid Dow Elanco American Cyanamid American Cyanamid	OTP-4/9/98 NR - Old NR - Old NR - Old	4/9/98 4/6/99 4/6/99 4/6/99		41725203 00026671 00040304 00059470
Series 84	Gene mutation; Structural chromosomal aberration; and, Other genotoxic effects	00153768 43135005 43135006 43177801 43177802 43135007	11/6/85 11/6/85 11/6/85 11/6/85 9/19/91 2/23/94 2/23/94 2/23/94 2/23/94 2/23/94 2/23/94 1973 1976	American Cyanamid	OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-10/8/98 OTP-10/8/98 OTP-10/8/98 OTP-10/8/98 OTP-10/8/98 OTP-10/8/98 OTP-10/8/98 NR - Old NR - Old	4/9/98 4/9/98 4/9/98 4/9/98 11/11/98 11/11/98 11/11/98 11/11/98 11/11/98 11/11/98 11/11/98 2/1/99 2/1/99		00153768 00153769 00153770 00153771 42027801 43135005 43135006 43177801 43177802 43135007 00026673 00067519
85-1	General Metabolism	00046275	9/27/74 2/23/94	American Cyanamid	NR - Old OTP-8/14/98	4/9/98 8/14/98 & 11/11/98		00046275 43135004
No Gdln.	Unknown Toxicity Data		1973	American Cyanamid	NR - Old	2/1/99		00106767
Occupational/Residential Exposure								
132-1a	Foliar Residue Dissipation				OJDD-4/9/98	4/9/98		
132-1b	Soil Residue Dissipation				OJDD-4/9/98	4/9/98		
Environmental Fate								

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Page 8 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

161-1	Hydrolysis	00106777	1974	American Cyanamid	NR - Old	4/9/98		00106777
161-2	Photodegradation - water	43808201 00153764	10/6/95 11/6/85	American Cyanamid	OTP-4/9/98 OTP-10/8/98	4/9/98 11/11/98		43808201 00153763
161-3	Photodegradation - soil	00153764	11/6/85	American Cyanamid	OTP-4/9/98	4/9/98		00153764
162-1	Aerobic Soil Metabolism	40185104	5/6/87	American Cyanamid	OTP-4/9/98	4/9/98		40185104
162-2	Anaerobic Soil Metabolism	40185105	5/6/87 3/10/94	American Cyanamid	OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98		40785105 43154701
162-3	Anaerobic Aquatic Metabolism	43154702 40813501	3/10/94 9/2/88	American Cyanamid	OTP-4/9/98 OTP-10/8/98	4/9/98 11/11/98		43154702 40813501
163-1	Leaching/Adsorption/ Desorption	43041901 00153765	12/8/93 11/6/85	American Cyanamid	OTP-4/9/98 OTP-10/8/98	4/9/98 11/11/98		43041901 00153765
163-2	Volatility - lab	00153766	11/6/85	American Cyanamid	OTP-4/9/98	4/9/98		00153766
164-1	Terrestrial Field Dissipation	41725204	12/7/90 12/7/90 3/31/92	American Cyanamid	OTP-4/9/98 OJDD-4/9/98 OTP-8/14/98 OTP-10/8/98	4/9/98 4/9/98 8/14/98 & 11/11/98 11/11/98		41725204 41725206 42261901
164-2	Aquatic Field Dissipation				OJDD-4/9/98 OTP-8/14/98	4/9/98 8/14/98 & 11/11/98		44527601
165-1	Confined Rotational Crop		2/6/96	American Cyanamid	OJDD-4/9/98 OTP-10/8/98	4/9/98 11/11/98		43918601
165-2	Field Rotational Crop				OJDD-4/9/98	4/9/98		
165-4	Bioaccumulation in Fish		1/30/86 4/16/86	American Cyanamid	OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98		00156726 00158235

68

Updated Matrix

Product Name: Pendimethalin Technical
EPA File Symbol No. 68156-L
Date: April 7, 1999

Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Page 9 of 16

Application for Registration Dated: April 9, 1998

Gdin. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

201-1	Droplet Size Spectrum				TASK FORCE		Dintec is the affiliate of a Task Force member and can rely on the data	
202-1	Drift Field Evaluation				TASK FORCE		Dintec is the affiliate of a Task Force Member and can rely on the data	

69

Product Name: Pendimethalin Technical
EPA File Symbol No. 68156-L
Date: April 7, 1999

Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

Residue Chemistry							
171-4a	Nature of Residue - Plant		12/21/74 4/29/80 2/9/76 2/9/76 9/27/74 9/27/74 2/9/76 2/9/76 4/10/78 8/25/80 1/22/81 5/8/81 1/7/82 9/27/74 10/5/78 9/21/79 2/9/76 4/27/90 9/4/92 3/3/93 3/10/94	American Cyanamid	NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98	00029803 00031219 00039535 00039537 00046278 00046280 00051963 00051965 00058478 00067293 00071121 00074621 00093698 00106779 00106795 00108317 00109915 41469901 42467801 42686401 43154705
171-4b	Nature of Residue - Livestock		9/2/74 9/27/74 8/25/80 8/25/80 1/22/81 12/3/90 9/4/92 3/10/94	American Cyanamid	NR - Old NR - Old NR - Old NR - Old NR - Old OTP-4/9/98 OTP-4/9/98 OTP-8/14/98	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 8/14/98 & 11/11/98	00046275 00046293 00067288 00067289 00071124 41713901 42467802 43154703

70

Updated Matrix			Submitter: Dintec Agrichemicals 9330 Zionsville Road Indianapolis, Indiana 46268-1054			Page 11 of 16		
Product Name: <u>Pendimethalin Technical</u>						Application for Registration Dated: <u>April 9, 1998</u>		
EPA File Symbol No. <u>68156-L</u>								
Date: <u>April 7, 1999</u>								
Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.

171-4c	Residue Analytical Method - Plants		9/12/78	American Cyanamid	NR - Old	4/9/98		00019004
			9/27/74		NR - Old	4/9/98		00023780
			9/27/74		NR - Old	4/9/98		00023781
			9/27/74		NR - Old	4/9/98		00023782
			9/27/74		NR - Old	4/9/98		00024823
			2/13/80		NR - Old	4/9/98		00025820
			2/13/80		NR - Old	4/9/98		00025821
			2/13/80		NR - Old	4/9/98		00025822
			2/13/80		NR - Old	4/9/98		00025827
			2/13/80		NR - Old	4/9/98		00025828
			2/13/80		NR - Old	4/9/98		00025831
			2/13/80		NR - Old	4/9/98		00025832
			2/13/80		NR - Old	4/9/98		00025833
			9/27/74		NR - Old	4/9/98		00025837
			1973		NR - Old	4/9/98		00029018
			1973		NR - Old	4/9/98		00029020
			4/29/80		NR - Old	4/9/98		00031212
			4/29/80		NR - Old	4/9/98		00031214
			2/9/76		NR - Old	4/9/98		00039519
			2/9/76		NR - Old	4/9/98		00039520
			2/9/76		NR - Old	4/9/98		00039521
			2/9/76		NR - Old	4/9/98		00039522
			2/9/76		NR - Old	4/9/98		00039526
			2/9/76		NR - Old	4/9/98		00039527
			2/9/76		NR - Old	4/9/98		00039528
			2/9/76		NR - Old	4/9/98		00039529
			11/20/75		NR - Old	4/9/98		00041898
			11/20/75		NR - Old	4/9/98		00041901
			2/9/76		NR - Old	4/9/98		00041904
			2/9/76		NR - Old	4/9/98		00051958
			2/9/76		NR - Old	4/9/98		00051959
			2/9/76		NR - Old	4/9/98		00051960

Updated Matrix

Product Name: Pendimethalin Technical
EPA File Symbol No. 68156-L
Date: April 7, 1999

Submitter: Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, Indiana 46268-1054

Page 12 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SKRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

171-4c	Residue Analytical Method - Plants <i>cont.</i>		2/9/76	American Cyanamid	NR - Old	4/9/98		00051961
			2/9/76		NR - Old	4/9/98		00051962
			2/9/76		NR - Old	4/9/98		00052558
			2/8/77		NR - Old	4/9/98		00070962
			1/22/81		NR - Old	4/9/98		00071120

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 13 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
73 171-4c	Residue Analytical Method - Plants <i>cont.</i>		11/20/75	American Cyanamid	NR - Old	4/9/98		00072810
			2/9/76		NR - Old	4/9/98		00072822
			2/9/76		NR - Old	4/9/98		00072823
			2/9/76		NR - Old	4/9/98		00072824
			2/9/76		NR - Old	4/9/98		00072825
			1974 study date		NR - Old	4/9/98		00106752
			1/6/78		NR - Old	4/9/98		00106791
			9/21/79		NR - Old	4/9/98		00106808
			10/29/79		NR - Old	4/9/98		00106830
			3/27/90		OTP-4/9/98	4/9/98		41431001
			8/14/91		OTP-4/9/98	4/9/98		41982701
			9/10/92		OTP-4/9/98	4/9/98		42471902
			4/3/92		OTP-4/9/98	4/9/98		42266302
			7/27/93		OTP-4/9/98	4/9/98		42859202
			12/28/93		OTP-4/9/98	4/9/98		43068501
			4/6/94		OTP-4/9/98	4/9/98		43185901
			3/2/94		OTP-4/9/98	4/9/98		43147801
			4/6/98		OTP-8/14/98	8/14/98 & 11/11/98		44527602
			4/6/98		OTP-8/14/98	8/14/98 & 11/11/98		44527603
			5/22/86		OTP-8/14/98	8/14/98 & 11/11/98		00159810
			2/2/87		OTP-10/8/98	11/11/98		40063201
			5/6/87		OTP-10/8/98	11/11/98		40185102
			7/13/87		OTP-10/8/98	11/11/98		40206601
			5/1/86		OTP-10/8/98	11/11/98		00158624
			5/6/87		OTP-10/8/98	11/11/98		40185103
			5/21/91		OTP-10/8/98	11/11/98		41881202
			4/3/92		OTP-10/8/98	11/11/98		42266303
			4/3/92		OTP-10/8/98	11/11/98		42266305
			4/3/92		OTP-10/8/98	11/11/98		42266306
			3/30/87		OTP-10/8/98	11/11/98		40140802
171-4d	Residue Analytical Method - Animal	00023796	9/27/74	American Cyanamid	NR - Old	4/9/98		00023796
			6/1/76		NR - Old	4/9/98		00058835

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 14 of 16

Application for Registration Dated: April 9, 1998

Gdln: Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

171-4e	Storage Stability		4/3/92 9/10/92 4/19/91	American Cyanamid	OTP-4/9/98 OTP-4/9/98 OTP-4/9/98	4/9/98 4/9/98 4/9/98		42266301 42471903 41845801
171-4k/l	Crop Field Trials/Processed Food							
	Tobacco				OJDD-4/9/98	4/9/98		
	Potatoes		10/5/78	American Cyanamid	NR - Old	4/9/98		00106797
	Garlic		6/11/87	UC-Davis	n/a	4/9/98	Public Literature	40232501
	Onion	41827401	3/29/91	IR-4	n/a	4/9/98	Public Literature	41827401
	Rice, grain, straw Processed		8/25/80 1/22/51	American Cyanamid	NR - Old NR - Old OJDD-4/9/98	4/9/98 4/9/98 4/9/98		00067283 00071120
	Beans (Succulent & Dry) and forage & hay		2/9/76 2/9/76 2/9/76 2/9/76 2/9/76 2/9/76 2/9/76 2/9/76 2/9/76 9/4/81	American Cyanamid	NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		00039518 00039519 00039520 00039521 00039522 00039523 00039524 00039534 00081581

56

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road.
 Indianapolis, Indiana 46268-1054

Page 15 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------------	--------------	---------------------	-------------------	--------------	--------------------------------	--------------------------------	-----------------	-------------------------------------------

	Soybeans - forage & hay	43154704 00161759	3/10/94 9/10/92 5/6/87 7/29/86 7/29/86 7/29/86 2/13/80 12/21/74 11/20/75	American Cyanamid	OTP -4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 OTP-4/9/98 NR - Old NR - Old NR - Old	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		43154704 42471901 40185101 00161759 00161760 00161761 00025818 00029801 00041897
	Corn - grain, fresh, forage & fodder	00106820	9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 9/27/74 1973 study date 1973 study date unknown study date 1/7/82 5/8/81 1/15/82 5/11/78	American Cyanamid	NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old NR - Old	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		00023786 00023787 00023788 00023789 00023790 00023791 00023792 00023793 00023794 00023795 00029028 00029029 00030697 00093697 00074619 00093719 00106820

75

Updated Matrix

Product Name: Pendimethalin Technical
 EPA File Symbol No. 68156-L
 Date: April 7, 1999

Submitter: Dintec Agrichemicals
 9330 Zionsville Road
 Indianapolis, Indiana 46268-1054

Page 16 of 16

Application for Registration Dated: April 9, 1998

Gdln. Ref. No.	Name of Test	SRRD MRID No.	Date Submitted	Submitted By	Offer to Compensate Date	Original EPA Matrix Date	Additional Info	MRID No. Accession No. Other ID No.
----------------	--------------	---------------	----------------	--------------	--------------------------	--------------------------	-----------------	-------------------------------------

	Sorghum - grain, forage & fodder		1/6/78 8/14/79 9/14/82	American Cyanamid	NR - Old NR - Old NR - Old	4/9/98 4/9/98 4/9/98		00106791 00106807 00114313
	Cotton		9/11/78 8/14/79 1974 study date 5/21/91 7/27/93	American Cyanamid	NR - Old NR - Old NR - Old OTP-4/9/98 OTP-4/9/98 OJDD-4/9/98	4/9/98 4/9/98 4/9/98 4/9/98 4/9/98		00018997 00106829 00106752 41881201 42858901
	Peanuts - hulls, forage & hay		4/29/80 4/29/80 4/29/80 2/9/76	American Cyanamid	NR - Old NR - Old NR - Old NR - Old	4/9/98 4/9/98 4/9/98 4/9/98		00031215 00031216 00031217 00106785
	Sugarcane		7/27/93	American Cyanamid	OTP-4/9/98	4/9/98 4/9/98		42859201 PP#3F2765
	Sunflower seed		6/11/80	American Cyanamid	NR - Old	4/9/98		00134355
No Gdln. #	Response to HED draft Science Chapter		9/9/96	American Cyanamid	OTP-8/14/98	8/14/98 & 11/11/98		44106802

76



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 3, 1998

Dr. Richard F. Bing, Director
Global Research and Development
Dintec Agrichemicals
9330 Zionsville Road
Indianapolis, IN 46268-1054

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Dr. Bing:

Subject: Transfer of Pending Pesticide Registrations From
Company Number 33660 to Company Number 68156

Pursuant to your request in your letter and transfer agreement of October 27, 1998, we have approved the transfer of the following pending registrations from Industria Prodotti Chimici, S.p.A., company number 33660, to Dintec Agrichemicals, company number 68156.

The effective date of these changes is the date of this letter.

<u>Pending Product Name</u>	<u>Old EPA File Symbol</u>	<u>New EPA File Symbol</u>
Pendimethalin Technical	33660-UN	68156-L
Ipimethalin-L	33660-GO	68156-A

The products listed above are pending registrations and therefore cannot be marketed until they have been registered.

The transferred pending registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the

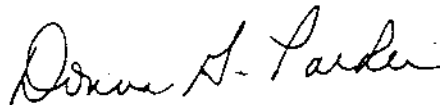
77

schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer please contact me at (703) 305-6474.

Sincerely,



Donna G. Parker
Information Management Specialist
Information Services Branch
Information Resources & Services Div. (7504C)

cc: Mr. E. David Lewis
Lewis & Harrison, Agent for
Industria Prodotti Chimici, S.p.A.
122 C Street, N.W., Suite 740
Washington, DC 20001

LAW OFFICES
BEVERIDGE & DIAMOND, P. C.
SUITE 700
1350 I STREET, N.W.
WASHINGTON, D. C. 20005-3311
(202) 789-6000

KATHRYN E. SZMUSZKOVICZ
DIRECT DIAL NUMBER
(202) 789-6037
INTERNET kszmuskovicz@bdlaw.com
MCI Mail 752-0899

TELECOPIER (202) 789-6190

July 1, 1998

40TH FLOOR
437 MADISON AVENUE
NEW YORK, N. Y. 10022-7380
(212) 702-5400

BEVERIDGE & DIAMOND
SUITE 400
ONE BRIDGE PLAZA
FORT LEE, N. J. 07024-7502
(201) 585-8162

BEVERIDGE & DIAMOND
SUITE 3400
ONE SANSOME STREET
SAN FRANCISCO, CA 94104-4438
(415) 397-0100

Kevin M. Lee, Esq.
Acting Associate General Counsel for
Pesticides and Toxic Substances
Office of General Counsel
U.S. Environmental Protection Agency
401 M Street, S.W. (Mail Code 509 E)
Washington, D.C. 20460

Re: Petition To Deny Applications Of I.Pi.Ci For Registration Of
Pesticides Containing Pendimethalin As The Active Ingredient

Dear Mr. Lee:

We are writing on behalf of American Cyanamid Company (Cyanamid), which is the sole U.S. registrant of pendimethalin and the owner of all the data submitted to EPA that support pendimethalin registration. I.Pi.Ci. Industria Prodotti Chimici S.p.A. (IPiCi) has notified Cyanamid in writing that it is applying to EPA to register pesticides containing pendimethalin as the active ingredient. However, based on the information available to Cyanamid at this time, IPiCi has not met the requirements for registration. Accordingly, enclosed for filing are three copies of a *Petition To Deny Applications Of I.Pi.Ci. Industria Prodotti Chimici S.p.A. For Registration Of Pesticide Products Containing Pendimethalin As The Active Ingredient*.

Cyanamid requests that EPA confirm that it will not grant IPiCi's applications for registration without first making a final determination on this Petition. See 40 C.F.R. § 152.99(c)(3). Cyanamid further requests that, because EPA's action on this Petition is final agency action subject to judicial review, the Agency grant Cyanamid ten days in which to seek an administrative or judicial stay prior to any final approval of the registration that EPA may decide to grant.

Thank you for your consideration.

Sincerely,



Kathryn E. Szmuszkovicz

Enclosures

cc: Kathy A. Gleason (American Home Products)
E. David Lewis (Agent For IPiCi)
James A. Tompkins (Fungicide-Herbicide Branch, OPP, EPA)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

4/20/98

Lewis & Harrison
122 C St, NW, Suite 740
Washington, DC 20001

PRODUCT NAME: *Fen dimethalin Technical*
COMPANY NAME: *L.P.I. Co. S.P.A.*
OPP IDENTIFICATION NUMBER: *265337*
EPA FILE SYMBOL: *33660-UN*
EPA RECEIPT DATE: *4/13/98*

SUBJECT: RECEIPT OF APPLICATION FOR A NEW REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new registration and it has passed an administrative screen for completeness.

Please note that this is only a notification of receipt of your application. This is only the first step in the application process, and does NOT constitute approval.

If you have any questions please contact *Jim Longhurst,*
Product Manager 25, at (703) 305-5697.

Sincerely,

J.A. Hollen

Front End Processing Staff
Information Services Branch
Information Resources & Services Division

80

11/10/98 Renew
from TRB-Tox; S. Malak

68155-5
Pendimethalin Technical

SUMMARY OF Ipimethalin-L Bean Sheet Results:

DP BARCODE No.: 249731

Pendimethalin; N-(1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine

On behalf of Industria Prodotti Chimici S. P. A., Lewis & Harrison requests a "Me-Too" registration of this technical grade of active ingredient, claiming its similarity to American Cyanamid Prowl Technical Herbicide, Reg. No. 241-245. In support of this request, the applicant included product chemistry data, product's CSF a basic formulation dated 15/MAR/1998, and label EPA received 29/MAY/1998. A Certification With Respect to Citation of Data was also included with this submission.

FINDINGS:

2. The submitted product chemistry data is adequate and satisfy the requirements for a "Me-Too" registration of this technical grade of active ingredient.
3. An adequate GC analytical method is available for enforcement.

Emphasis:

This product is substantially similar chemically to 241-245

81

NIFT

B

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

**EPA**
 United States
 Environmental Protection Agency
 Washington, DC 20460

- ☒
- Registration**
-
- ☐
- Amendment**
-
- ☐
- Other**

 OPP Identifier Number
 265337
Application for Pesticide - Section I

1. Company/Product Number

33660-~~not yet assigned~~ - UN

2. EPA Product Manager

Jim Tompkins

3. Proposed Classification

☒ None ☐ Restricted

4. Company/Product (Name)

Pendimethalin Technical

PM#

Team 25

5. Name and Address of Applicant (Include ZIP Code)

I.Pi.Ci. S.p.A.

Via Fratelli Beltrami, 11

20026 Novate Milanese, ITALY

 6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

EPA Reg. No. 241-245

Product Name PROWL TECHNICAL HERBICIDE

**PLEASE SEND ALL CORRESPONDENCE TO
 CONTACT POINT LISTED BELOW**
☐ Check if this is a new address
Section - II
☐ Amendment - Explain below.

☐ Resubmission in response to Agency letter dated _____

☐ Notification - Explain below.

☐ Final printed labels in response to Agency letter dated _____

☐ "Me Too" Application

☐ Other - Explain below
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes*

☒ No

Unit Packaging

☐ Yes

☒ No

Water Soluble Packaging

☐ Yes

☒ No

2. Type of Container

☐ Metal

☒ Plastic (HDPE)

☐ Glass

☐ Paper

☐ Other (Specify)

***Certification must
 be submitted**

If "Yes"

Unit Packaging wgt.

No. per

container

If "Yes"

Package wgt.

No. per

container

3. Location of Net Contents Information

☒ Label

☒ Container

4. Size(s) Retail Container

1 KG TO BULK

5. Location of Label Directions

☒ On Label

☒ On labeling accompanying product

6. Manner in Which Label is Affixed to Product

☒ Lithograph

☒ Paper glued

☒ Stenciled

☐ Other
Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

 Name E. David Lewis, Lewis & Harrison
 122 C St. NW Suite 740, Washington DC 20001

Title

Agent for I.Pi.Ci. S.p.A.

 Telephone No. (Include Area
 Code)

202-393-3903

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Agent for I.Pi.Ci. S.p.A.

4. Typed Name

E. David Lewis, Lewis & Harrison

5. Date

APRIL 9, 1998

 6. Date Application
 Received
 (Stamped)

82



United States
Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2070-0050
Approval Expires 05-31-95

Certification with Respect to Citation of Data

Applicants Name and Address

I.Pi.Ci. S.p.A.

Via Fratelli Beltrami, 11
20026 Novate Milanese ITALY

EPA File Symbol/Registration Number

33660 ^{UN} ~~not yet assigned~~

Product Name

Pendimethalin Technical

Date of Application

04/09/98

NOTE: If your product is a 100% repackaging of another EPA-registered product that you purchase, and is labeled for the same uses, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product that is identical or substantially similar and this is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application. (Check the appropriate boxes, in items 2 and 3, or 4 below that pertain to your application.)

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study.

☐ I am the original submitter; or

☐ I have obtained the written permission of the original submitter for _____, which is

(insert name of chemical)

(insert names of companies) (for multiple chemicals link the

companies who are original data submitters with the appropriate chemical name) to cite that study

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study;

a. ☒ I am the original data submitter; or

☐ I have obtained the written permission of the original data submitter for _____, which is

(insert name of chemical)

(insert names of companies) (for multiple chemicals link the companies who are original data submitters

with the appropriate chemical name) to cite that study; or

b. ☒ I have notified in writing the companies American Cyanamid Co. for Pendimethalin that

(insert names of companies)

(insert name of chemical)

have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(F) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA); and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are:

Companies American Cyanamid Co. for Pendimethalin (for multiple

(insert names of companies)

(insert name of chemical)

chemicals link the companies who are original data submitters with the appropriate chemical name) listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all method or cite-all option under Selective Method). (Also, sign the General Offer Statement below.)

Companies _____ for _____ (for multiple

(insert names of companies)

(insert name of chemical)

chemicals link the companies who are original data submitters with the appropriate chemical name) that have submitted studies which I have cited (Selective method).

4. ☐ I certify that for each study cited in support of this application I am not required to offer data compensation or obtain written permission because all time periods for exclusive use and data compensation have expired.

A Data Matrix identifying these studies is attached. (Note: a Data Matrix is not required under the cite-all method)

Signature

Name and Title

E. David Lewis, Lewis & Harrison
Agent for I.Pi.Ci. S.p.A.

Date

04/09/98

General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required.

Signature

Name and Title

Date

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

April 9, 1998

By Certified Mail

Ms. Nancy Rachman
Vice President of Regulatory Affairs
American Cyanamid
Agricultural Services Division
Quaker Bridge & Clarksville Road
Princeton, New Jersey 08543

Dear Ms. Rachman:

RE: Offer to Compensate for Pendimethalin Data

Our client, I.Pi.Ci. - Industria Prodotti Chimici S.p.A., Via F. Beltrami, 11, 20026 Novate Milanese, Italy ("I.Pi.Ci."), is applying for registration of two products containing the active ingredient pendimethalin, Pendimethalin Technical (92.6% active ingredient) and Ipimethalin L (37.4% active ingredient). I.Pi.Ci. is citing the data listed in Attachment A in support of these applications.

Pursuant to FIFRA §3(c)(1)(F) I.Pi.Ci. offers to:


1. Pay compensation for the compensable data listed in Attachment A and owned by your company, to the extent required by law, and
2. Enter into negotiations to determine which of these data may be subject to compensation and the amount and terms of any compensation due.

Further, the recent pendimethalin RED issued by EPA identifies certain data gaps that must be fulfilled by the registrants. Accordingly, pursuant to FIFRA §3(c)(1)(F) and §3(c)(2)(B), I.Pi.Ci. irrevocably offers to jointly develop or share in the cost of developing the additional generic data required by EPA as part of its reregistration process. These data are listed in Attachment B. I.Pi.Ci. agrees to commence negotiations to determine the cost and terms governing the development of these data. Should we be unable to reach an agreement on the terms for data development, or a satisfactory procedure for reaching such agreement, I.Pi.Ci. agrees to be bound by the results of binding arbitration pursuant to FIFRA §3(c)(2)(B)(iii).

84

We look forward to hearing from you and discussing these matters further at your earliest convenience. Based on the letter we received from Ms. Cynthia Allen, it would appear that both parties are in agreement that any discussions should be held pursuant to a confidentiality agreement. If this understanding is correct, please return a signed copy of the previously furnished confidentiality agreement so that discussions can be initiated.

Sincerely,



E. David Lewis

for,

I.Pi.Ci. - Industria Prodotti Chimici S.p.A.

Enclosures

cc: Dr. Guido Ravetta, I.Pi.Ci.

85

Attachment A

List of Compensable MRIDS

43185901	00161759	42137101
44106804	44106803	00131772
00153764	43135003	41982701
42859202	42372205	00131774
43154704	40185101	00153768
00156081	00153766	42266301
40185105	42372207	41451905
44106801	41469901	42372201
00153771	40909901	43135001
00156726	41725202	41451907
41431001	42471902	42372202
41451904	42054601	41451909
00161760	00153770	42471901
43808201	43154702	43154701
00153769	41451906	41881201
00131773	00131775	42372206
42372204	41845801	00161761
42266302	41713901	42467802
40185104	42467801	00153767
00153772	40174401	41725204
41725203	42471903	00158235
42859201	43041901	
43068501	42858901	
42372203	42686401	
43147801	43154705	
41451908	41909701	

Attachment B

Offer to Jointly Develop or Share in the Cost of Developing the Additional Generic Data Required by EPA as Part of the Reregistration Process

Guideline
Reference
Number

Study Title

71-4	Avian Reproduction-quail and duck
132-1(a)	Foliar Residue Dissipation
132-1(b)	Soil Residue Dissipation
164-1	Soil dissipation
164-2	Aquatic field dissipation
165-1	Confined rotational crop
165-2	Field rotational crop
171-4	Rice - Processed
171-4	Cottongin by-products
171-4	Tobacco

LEWIS & HARRISON

Consultants In Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

CERTIFIED

Z 203 337 746

MAIL

Ms. Nancy Rachman
Vice President of Regulatory Affairs
American Cyanamid
Agricultural Services Division
Quaker Bridge & Clarksville Road
Princeton, NJ 08543

Postmark or Date	3800
TOTAL Postage & Fees	\$

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, 4a, and 4b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Ms. Nancy Rachman Vice President of Regulatory Affairs American Cyanamid Agricultural Services Division Quaker Bridge & Clarksville Road Princeton, NJ 08543		4a. Article Number Z 203 337 746	
		4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name) 6. Signature: (Addressee or Agent) X		7. Date of Delivery 8. Addressee's Address (Only if requested and fee is paid)	

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

Z 203 337 746

US Postal Service

Receipt for Certified Mail

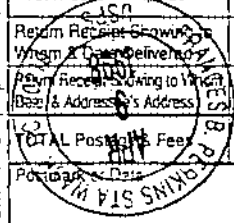
No Insurance Coverage Provided.

Do Ms. Nancy Rachman (See Reverse)

Sr Vice President of Regulatory Affairs
American Cyanamid
Sr Agricultural Services Division
Quaker Bridge & Clarksville Road
Princeton, NJ 08543

Postage	\$ 1.55
Certified Fee	1.35
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt (if required)	
When & Where Delivered	1.10
Postage (if required)	
Postage (if required)	
TOTAL Postage & Fees	\$ 3.00
Postmark & Date	

PS Form 3800 April 1995



89

Public Copy - Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO <input checked="" type="checkbox"/> X	4. Page 1 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

Section Product Chemistry 158.190		
61-1	Identity of Ingredients	X
61-2 (a)	Beginning Materials & Manufacturing Process	X
61-2 (b)	Discussion of Formation of Impurities	X
61-3	Discussion of Formation of Ingredients	X
62-1	Preliminary Analysis	X
62-2	Certification of Limits	X
62-3	Analytical method for enforcement of limits	X
63-2	Color	X
63-3	Physical State	X
63-4	Odor	X
63-5	Melting Point	X
63-6	Boiling Point	
63-7	Density, Bulk Density, or Specific Gravity	X
63-8	Solubility	X
63-9	Vapor Pressure	X
63-11	Oct/Water Partition Coefficient	X

96

Public Copy -- Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <u>UN</u>	3. Formulator's Exemption Selected: YES NO X	4. Page 2 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

63-12	pH	
63-13	Stability	X
63-14	Oxidizing or Reducing Action	X
63-15	Flammability	
63-16	Explosibility	
63-17	Storage Stability	X
63-18	Viscosity	
63-19	Miscibility	
63-20	Corrosion char.	X
63-21	Dielectric breakdown voltage	
Section 158.145 Wildlife and Aquatic Organisms		
71-1	Acute Avian Oral Toxicity	
71-2(a)	Acute Avian Dietary- mallard duck	
71-2(b)	Acute Avian Dietary- bobwhite quail	
71-4	Avian Reproduction	
72-1(a)	Acute Freshwater Fish -warmwater	
72-1(b)	Acute Freshwater Fish -warmwater (TEP)	

Public Copy – Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO X	4. Page 3 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

72-1(c)	Acute Freshwater Fish-coldwater	
72-1(d)	Acute Freshwater Fish-coldwater -TEP	
72-2 (a)	Acute Freshwater Invertebrate toxicity	
72-2(b)	Acute Freshwater Invertebrate toxicity - TEP	
72-3(a)	Acute Toxicity Estuarine and Marine -oyster	
72-3(b)	Acute Tox - shrimp	
72-3(c)	Acute Tox -marine fish	
72-3(a)	Acute Toxicity Estuarine and Marine -oyster -TEP	
72-3(b)	Acute Tox - shrimp - TEP	
72-3(c)	Acute Tox -marine fish -TEP	
72-4(b)	Aquatic Invertebrate Life-Cycle	
72-5	Fish-Life Cycle	

Public Copy - Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO X	4. Page 4 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

Section	Toxicology	
158.135		
81-1	Acute Oral Tox - Rat	
81-2	Acute Dermal Tox	
81-3	Acute Inhalation Tox - Rat	
81-4	Primary Eye Irritation	
81-5	Primary Skin Irritation	
81-6	Dermal sensitization	
82-1(a)	90-day feeding - rodent	
82-1 (b)	90-day feeding - dog	
82-2	21-Day Dermal	
83-1 (a)	Chronic tox - rodent	
83-1 (b)	Chronic tox - dog	
83-2 (a)	Oncogenicity - rat	
83-2 (b)	Oncogenicity - mouse	
83-3 (a)	Teratogenicity - rat	
83-3(b)	Teratogenicity - rabbit	
83-4	2-generation reproduction - rat	

6-10

Public Copy – Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO <input checked="" type="checkbox"/> X	4. Page 5 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

Series 84	Gene Mutation; Structural Chromosomal Aberration; and, Other Genotoxic Effects	
85-1	General Metabolism	
Section Plant Protection 158.540		
123-1 (a)	Seed Germination, Seedling Emergence Tier II	
123-1(b)	Vegetative Vigor	
123-2	Aquatic Plant Growth	
Section Occupational/Residential 158.390 Exposure		
132-1(a)	Foliar Residue Dissipation	
132-1(b)	Soil Residue Dissipation	
Section Non-Target Insect 153.590		
141-1	Honey bee acute toxic	

hb

Public Copy - Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO X	4. Page 6 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

Section	Environmental Fate	
158.290		
161-1	Hydrolysis	
161-2	Photodegradation - water	
161-3	Photodegradation - soil	
162-1	Aerobic soil metabolism	
162-2	Anaerobic soil metabolism	
162-3	Anaerobic aquatic metabolism	
163-1	Leaching, Adsorption, Desorption	
163-2	Volatility - lab	
164-1	Soil dissipation	
164-2	Aquatic field dissipation	
165-1	Confined rotational crop	
165-2	Field rotational crop	
165-4	Bioaccumulation in fish	

Public Copy – Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>	3. Formulator's Exemption Selected: YES NO <input checked="" type="checkbox"/> X	4. Page 7 of 8
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998	7. Name of Active Ingredient(s): Pendimethalin	
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements		
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant		

Section	Residue Chemistry	
158.125		
171-4(a)	Nature of residue – plants	
171-4(b)	Nature of residue – livestock	
171-4(c)	Residue analytical Method – plant	
171-4(d)	Residue analytical method – animal	
171-4(e)	Storage stability	
171-4 (k&l)	Rice- grain, straw Processed	
171-4 (k&l)	Soybean - & forage & hay	
171-4 (k)	Corn -grain, fresh, forage & fodder	
171-4 (k&l)	Cotton	
171-4(k)	Beans (succulent and dry) – & forage & hay	
171-4(k)	Tobacco	
171-4(k)	Corn	
171-4(k)	Onion	
171-4(k)	Sorghum –grain, forage & fodder	

0/6

Public Copy – Non-Confidential

1. Product Name: Pendimethalin Technical		2. EPA Reg. No/File Symbol: 33660- <i>UN</i>		3. Formulator's Exemption Selected: YES NO <input checked="" type="checkbox"/> X		4. Page 8 of 8	
5. Applicant's Company Name and Address: (I.Pi.Ci.) Industria Prodotti Chimici, S.p.A. Via F. Beltrami, 11 20026 Novate Milanese, Italy		6. Application for Registration Dated: April 9, 1998		7. Name of Active Ingredient(s): Pendimethalin			
8. 40 CFR Part 158		9. Source of Data Satisfying Requirements					
8.a Guideline Reference Number	8b. Name of Test	9a. Submitted by Applicant					

171-4 (k&l)	Peanuts - & hulls, forage, hay		
171-4 (k&l)	Sugarcane		
171-4 (k&l)	Potatoes		
171-4(l)	Sunflower Seed		
Section 158.440	Spray Drift		
201-1	Droplet size spectrum	X	
202-1	Drift field evaluation	X	

77

Supplemental Claim of Data Confidentiality

Identity of Confidential Material: Columns 9b, 9c, 9d, 9e, 9f, and 10 on all pages of the Matrix are claimed confidential in their entirety. Similarly, the footnotes (pages 21 and 22) and attachments to the Matrix are also claimed confidential in their entirety. No claim of confidentiality is made for the remainder of the matrix. For the Agency's convenience, a non-confidential public version of the matrix is also enclosed.

Rational for Claim: The affected columns, footnotes, and attachments provide a template for obtaining a pendimethalin registration by the selective method (40 C.F.R. §152.90). Development of the matrix took place over an eighteen-month period and entailed obtaining, reviewing, and evaluating DER's and other reviews for all of the cited studies. Numerous telephone conversations with EPA reviewers and the Reregistration Chemical Review Manager were also required to determine the validity of the data cited. I.Pi.Ci. invested considerable time and money in developing the matrix. Accordingly, I.Pi.Ci. has a substantial intellectual property right in the matrix, and any public release of the confidential portion of the matrix would deprive I.Pi.Ci. of its potential rights to compensation for the development of the matrix.

Time Period for Protection: Protection is claimed for fifteen (15) years. This period coincides with the period provided under FIFRA for data compensation.

Measures taken to Ensure Confidentiality: Aside from I.Pi.Ci. personnel and consultants/attorneys directly involved in the preparation or review of the matrix, all of whom are bound by confidentiality agreements and/or attorney client privilege, the matrix has only been released to EPA. I.Pi.Ci. will only release the confidential portion of the matrix to other parties pursuant to a confidentiality agreement.

Previous Disclosures: The only disclosures are those described above. All such disclosures have been made pursuant to confidentiality agreements or are covered by attorney client privilege.

Harmful Effects: I.Pi.Ci. is a relatively small company with few EPA registrations. In addition to the obvious loss of its monetary rights in the data, release of the matrix would provide follow-on applicants with a tested template for registering pendimethalin in the quickest fashion and at the least cost. Accordingly, it would enable much more rapid entry into the market by follow-on applicants capable of directly competing with I.Pi.Ci.

Voluntary Nature of Disclosure: Information contained in the footnotes and in the attachments is not required for a selective method data matrix. This information is voluntarily provided solely for the convenience of the EPA reviewers. Inclusion of this confidential information will reduce Agency manpower necessary to review the package. If EPA releases this information to the public, I.Pi.Ci. cannot be expected to voluntarily make it available in the future.



E. David Lewis, Lewis & Harrison
U.S. Agent, I.Pi.Ci., Industria Prodotti Chimici, S.p.A.

4/8/98

Date

United States Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address Dintec Agrichemicals 9330 Zionsville Road Indianapolis, IN 46268	EPA File Symbol/Registration Number 68156-5
	Product Name Pendimethalin Technical
	Date of Confidential Statement of Formula (EPA Form 8570-4) 9/15/99

As an authorized representative of the applicant for registration of the product identified above, I here certify that:

- (1) This product contains the following active ingredient(s):

pendimethalin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging of another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicate, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient	Product Name	Registration Number
pendimethalin	<div style="background-color: black; height: 20px; width: 100%;"></div> <p style="text-align: center;">PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED</p>	
Signature <i>Larry E. Hammond/RLC</i>	Name and Title Larry E. Hammond, Regulatory Manager	Date 11-22-99

100

N/E 7

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

April 9, 1998

Hand Delivered

Office of Pesticide Programs
Document Processing Desk (APPL)
Room 258, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Attn: Jim Tompkins, Product Manager Team 25,
Registration Division - Herbicide Branch

Dear Mr. Tompkins:

RE: I.Pi.Ci. - Industria Prodotti Chimici S.p.A. - Application for
Registration of Pendimethalin Technical (EPA File Symbol 33660- *UN*
Not Yet Assigned)

As U.S. agent for I.Pi.Ci., I am enclosing the following documents in support
of an application for registration of technical pendimethalin:

- 1) Transmittal Document;
- 2) Application for Pesticide Registration (OPP Identifier No. 265337);
- 3) Two (2) copies of the Confidential Statement of Formula;
- 4) Certification With Respect To Citation of Data, with Data Matrix
attached - Please note that both a confidential version (with attached
supplemental claim of data confidentiality) and a releasable public version
of the matrix are enclosed;
- 5) Five (5) copies of the draft product label;
- 6) Three (3) copies each of the data required for registration, as listed in the
enclosed Transmittal Document; and,
- 7) Letter of authorization from I.Pi.Ci.

As we discussed at the preregistration meeting on February 4, 1998, with you
and Dr. Sami Malak, this application is proceeding under the selective method
of data support. To simplify the reviewer's task, each cited MRID number
has been footnoted, and the appropriate EPA document establishing the
acceptability of the study (e.g., RED Appendix B Citation, DEP, etc.) has
been attached. Also, where typographical errors in the RED occur (e.g.,
inversion of MRID numbers, listing of the study under the wrong data

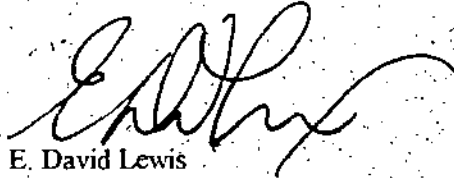
requirement, etc.), these have been noted in the attachments with the source of the correct information included for the reviewer's convenience.

As we discussed, the label essentially duplicates that of the substantially similar American Cyanamid product (Prowl Technical Herbicide, EPA Reg. No. 241-245). That is, I.Pi.Ci.'s label lists only the crops on American Cyanamid's label and the signal word and the precautionary statements are all identical to those on American Cyanamid's product.

Per our meeting, it is my understanding that review of the matrix and label will take place concurrent with review of the product chemistry data. As I explained, in order to meet shipping deadlines for next season it is critical to I.Pi.Ci. that review be completed by very early this fall. Based on the indications from you and Dr. Malak that Product Chemistry reviews are being completed in approximately 90 days, this should be a manageable deadline; however, please notify me if unexpected backlogs develop.

Insofar as Lewis & Harrison is the U.S. Agent for I.Pi.Ci., please relay all correspondence (including notification of the MRID numbers) concerning this registration directly to us. If any questions arise during the review process, I would appreciate it if the reviewer could contact me directly by phone at 202-393-3903.

Sincerely,



E. David Lewis
for,
I.Pi.Ci. - Industria Prodotti Chimici S.p.A.

EDL/d

Enclosures

cc: Dr. Guido Ravetta

Pendimethalin Technical

AN HERBICIDE FOR FORMULATING USE

ACTIVE INGREDIENT

Pendimethalin, (N-1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine) 92.6%

INERT INGREDIENTS

7.4%

TOTAL:

100%

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

Precaucion!

Precaucion Al Usuario: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

CAUTION. Harmful if swallowed. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center immediately.

In Case of Contact: Immediately flush eyes with plenty of water. Flush skin with water. Call a physician.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION:

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Formulators using this product are responsible for obtaining EPA registration of their formulated products. This pesticide may be used only for the formulation of herbicides to control most annual grasses and certain broadleaf weeds on the following crops:

Cotton, Dry Bulb Onions, Dry Bulb Shallots, Edible Beans (Dry, Lima, Snap, Chickpeas [Garbanzo beans], Southern Peas [Cowpeas]), Field Corn, Forage Legumes, Garlic, Grain Sorghum, Nonbearing Fruit, Nut Crops and Vineyards, Peanuts, Potatoes, Rice, Soybeans, Sugarcane, Sunflowers, Sweet Corn, Sweet Lupines, and Tobacco

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Open dumping is prohibited.

LIMITATIONS OF LIABILITY AND DAMAGES

The liability of I.Pi.Ci. and any other seller for any loss or injury, whether based on negligence, breach of warranty, strict liability in tort, or any other cause of action, shall be limited to the purchase price of the product. Prompt notice of any claim must be given by the buyer to I.Pi.Ci. within ninety days after the application of the product or ninety days after the first planting, whichever is later. Notification to I.Pi.Ci. should be at this address: Industria Prodotti Chimici, S.p.A. (I.Pi.Ci.) Via F. Beltrami, 11, 20026 Novate Milanese, Italy.

I.Pi.Ci. and any other seller of the product shall not be liable, and any and all claims against I.Pi.Ci. and any other seller are waived, for special, indirect, incidental, or consequential damages or expenses of any nature, including, but not limited to, loss of profits or income, and crop or property loss or damage, whether or not based on negligence, breach of warranty, strict liability in tort or any other cause of action.

I.Pi.Ci. OFFERS THIS PRODUCT AND THE BUYER AND USER ACCEPT IT SUBJECT TO THE FOREGOING CONDITIONS OF SALE AND LIMITATIONS OR WARRANTY, LIABILITY AND DAMAGES, WHICH MAY BE VARIED ONLY BY AGREEMENT IN WRITING SIGNED BY A DULY AUTHORIZED REPRESENTATIVE OF I.Pi.Ci.

Net Weight:

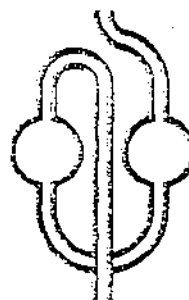
EPA EST. No. 53591-IT-001

EPA Reg. No. 33660- 44

MANUFACTURED FOR

I.Pi.Ci. Industria Prodotti Chimici S.p.A.
Via Fratelli Beltrami, 11
20026 Novate Milanese
Italy

c.c. milano 354544
N. Posizione Meccanogr. MI/022539
iscr. Trib. di Milano al n. 56.465 Soc.
cod. fisc. 00778300152
part. IVA 00778300152
cap. soc. L. 8.496.000.000 int. vers.



I.P.I.C.I. S.p.A.
industria prodotti chimici
Via Fratelli Beltrami, 11
20026 Novate Milanese - Italia

data AUGUST 13, 1996

n. rif.

vs. rif.

Mr. Stephen Johnson
Director
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mail, Building 2
Arlington, VA 22202

Dear Mr. Johnson:

This letter authorizes Lewis and Harrison of 122 C. Street, NW,
Suite 740, Washington, DC 20001, to act as agent on behalf of
Industria Prodotti Chimici, S.p.a., on all matters which may
come before the U.S. Environmental Protection Agency.

Sincerely,

Giorgio Oberrauch
Industria Prodotti Chimici S.p.A.

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

EPA TRANSMITTAL DOCUMENT

SUBMISSION DATED: April 9, 1998

STUDY SUBMITTER: I.Pi.Ci. S.p.A.
Via Fratelli Beltrami, 11
20026 Novate Milanese ITALY

SUBMITTED IN SUPPORT OF: Application For Pesticide Registration Of The Technical Product,
"Pendimethalin Technical"

EPA REGISTRATION NO: 33660-~~not yet assigned~~ *UN*

REGULATORY ACTION: Application for Pesticide Registration of a New Product

STUDIES SUBMITTED:

VOLUME 1: Product Identity and Composition of Pendimethalin Technical;
(February 4, 1998) by Cristina Marchiori, I.Pi.Ci. S.p.A.; I.Pi.Ci.
Document No. 1138/98; 11 pages with a 128-page Confidential
Attachment.

US EPA Guideline Series 61

MRID Number: _____

VOLUME 2: Analysis and Certification of Product Ingredients for Pendimethalin
Technical; (February 5, 1998) by Cristina Marchiori, I.Pi.Ci. S.p.A.; I.Pi.Ci.
Document No. 1139/98; 10 pages with a 134-page Confidential Attachment.

US EPA Guideline Series 62

MRID Number: _____

VOLUME 3: Pendimethalin Technical and Formulated Products: GLC Determination of
Pendimethalin in Technical and its Formulations. Validation of the Analytical
Method; (September 12, 1995) by Dr. S. Garofani; ChemService S.p.A.;
ChemService Study No. CH-38/95, IPICI PR0935, Doc. 1139/98; 104
pages (105 pages including page 3a).

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 4: Pendimethalin Technical: Determination of Six Impurities in Technical Product by GC. Validation of the Analytical Method; (March 4, 1997) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study No. CH-17/96, IPICI PR0899, Doc. 1139/98; 10 pages with a 147-page Confidential Attachment.

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 5: Pendimethalin Technical and Formulated: Determination of N-NO Pendimethalin Impurity Content by HPLC. Validation of the Analytical Method; (February 27, 1996) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study No. CH-37/95, IPICI PR0906, Doc. 1139/98; 9 pages with a 71-page Confidential Attachment.

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 6: Pendimethalin Technical: Determination of the Volatile Nitrosamines. Validation of the Analytical Method; (January 23, 1998) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study No. CH-17/97, IPICI PR0939, Doc. 1139/98; 9 pages with a 47-page Confidential Attachment.

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 7: Pendimethalin Technical: Quantitative Analysis of the Impurities Not Detectable by GC Analysis; (January 19, 1998) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study No. CH-4/97, IPICI PR0938, Doc. 1139/98; 10 pages with a 34-page Confidential Attachment.

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 8: Pendimethalin Technical: Silica Gel Column Separation of Impurities Not Detectable by GC Analysis and Their Identification; (February 4, 1998) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study No. CH-19/96, IPICI PR0941; 10 pages with a 58-page Confidential Attachment.

US EPA Guideline Series 62-1 & 62-3

MRID Number: _____

VOLUME 9: Pendimethalin Technical: Determination of Appearance, Colour, and Odour; (April 28, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-05/95, IPICI PR0718; 15 pages (16 pages including page 2a).

US EPA Guideline Series 63-2, 63-3, and 63-4

MRID Number: _____

167

- VOLUME 10:** Pendimethalin Technical: Determination of the Melting Point; (April 14, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-01/95, IPICI PR0715; 20 pages (21 pages including page 2a).
US EPA Guideline Series 63-5
MRID Number: _____
- VOLUME 11:** Pendimethalin Technical: Determination of the Relative Density; (April 28, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-02/95, IPICI PR0716; 17 pages (18 pages including page 2a).
US EPA Guideline Series 63-7
MRID Number: _____
- VOLUME 12:** Pendimethalin Technical: Determination of the Water Solubility; (April 30, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-07/95, IPICI PR0720; 33 pages (34 pages including page 2a).
US EPA Guideline Series 63-8
MRID Number: _____
- VOLUME 13:** Pendimethalin Technical: Determination of the Solubility in Organic Solvents; (May 12, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-08/95, IPICI PR0721; 15 pages (16 pages including page 2a).
US EPA Guideline Series 63-8
MRID Number: _____
- VOLUME 14:** Pendimethalin Technical: Determination of the Vapour Pressure; (May 4, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-03/95, IPICI PR0717; 39 pages (40 pages including page 2a).
US EPA Guideline Series 63-9
MRID Number: _____
- VOLUME 15:** Pendimethalin Technical: Determination of the Partition Coefficient; (May 8, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService Study No. CH-09/95, IPICI PR0722; 36 pages (37 pages including page 2a).
US EPA Guideline Series 63-11
MRID Number: _____
- VOLUME 16:** Pendimethalin Technical: ~~Chemical Stability: Accelerated Storage Stability Test;~~ (February 4, 1998) by S. Garofani; ChemService S.p.A.; ChemService Study No. CH-40/94, IPICI PR0913; 10 pages (with a 277-page Confidential Attachment).
US EPA Guideline Series 63-13;
MRID Number: _____

VOLUME 17: Pendimethalin Technical: Determination of the Oxidizing Properties;
(May 4, 1995) by Dr. R. Fabbrini; ChemService S.p.A.; ChemService
Study No. CH-18/95, IPICI PR0728; 16 pages (17 pages including
page 2a).

US EPA Guideline Series 63-14

MRID Number: _____

VOLUME 18: Pendimethalin Technical – One Year Storage Stability Test Under
Warehouse Conditions And Corrosion Characteristics; (February 4,
1998) by Dr. S. Garofani; ChemService S.p.A.; ChemService Study
No. CH-38/94, IPICI PR0915; 11 pages (with a 397-page Confidential
Attachment).

US EPA Guideline Series 63-17

MRID Number: _____

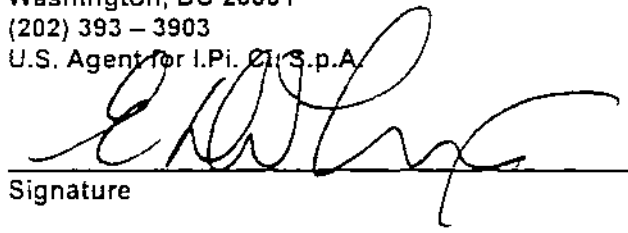
VOLUME 19: Pendimethalin Technical: Determination of Absorption Spectra
(UV/Vis, IR, NMR, MS; (April 28, 1995) by Dr. R. Fabbrini;
ChemService S.p.A.; ChemService Study No. CH-06/95, IPICI
PR0719; 31 pages (32 pages including page 2a).

US EPA Guideline OPPTS 830.7050

MRID Number: _____

COMPANY OFFICIAL/
COMPANY CONTACT:

E. David Lewis
Lewis & Harrison, L.L.C.
122 C Street, NW Suite 740
Washington, DC 20001
(202) 393 – 3903
U.S. Agent for I.Pi. C.I. S.p.A.



Signature

96-61-74

3-15-98

3-15-98

[illegible]

1997

1997

EPA Reg. No. 68/56-00005

Page is not included in this copy.

Pages 111 through 119 are not included in this copy.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients.
- ☐ Identity of product impurities.
- ☐ Description of the product manufacturing process.
- ☐ Description of quality control procedures.
- ☐ Identity of the source of product ingredients.
- ☐ Sales or other commercial/financial information.
- ☐ A draft product label.
- ☒ The product confidential statement of formula.
- ☐ Information about a pending registration action.
- ☐ FIFRA registration data.
- ☐ The document is a duplicate of page(s) .
- ☐ The document is not responsive to the request.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
